

DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION

Interim Final 2/5/99

RCRA Corrective Action
Environmental Indicator (EI) RCRIS code (CA750)
Migration of Contaminated Groundwater Under Control



Facility Name: Risdon Corporation
Facility Address: 15 Old Newtown Road, Danbury, CT
Facility EPA ID #: CTD001168558

RDMS DocID

106983

1. Has **all** available relevant/significant information on known and reasonably suspected releases to the groundwater media, subject to RCRA Corrective Action (e.g., from Solid Waste Management Units (SWMU), Regulated Units (RU), and Areas of Concern (AOC)), been **considered** in this EI determination?

☒ If yes - check here and continue with #2 below.

☐ If no - re-evaluate existing data, or

☐ If data are not available, skip to #8 and enter "IN" (more information needed) status code.

BACKGROUND**Definition of Environmental Indicators (for the RCRA Corrective Action)**

Environmental Indicators (EI) are measures being used by the RCRA Corrective Action program to go beyond programmatic activity measures (e.g., reports received and approved, etc.) to track changes in the quality of the environment. The two EI developed to-date indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater. An EI for non-human (ecological) receptors is intended to be developed in the future.

Definition of "Migration of Contaminated Groundwater Under Control" EI

A positive "Migration of Contaminated Groundwater Under Control" EI determination ("YE" status code) indicates that the migration of "contaminated" groundwater has stabilized, and that monitoring will be conducted to confirm that contaminated groundwater remains within the original "area of contaminated groundwater" (for all groundwater "contamination" subject to RCRA corrective action at or from the identified facility (i.e., site-wide)).

Relationship of EI to Final Remedies

While Final remedies remain the long-term objective of the RCRA Corrective Action program the EI are near-term objectives which are currently being used as Program measures for the Government Performance and Results Act of 1993, GPRA). The "Migration of Contaminated Groundwater Under Control" EI pertains ONLY to the physical migration (i.e., further spread) of contaminated ground water and contaminants within groundwater (e.g., non-aqueous phase liquids or NAPLs). Achieving this EI does not substitute for achieving other stabilization or final remedy requirements and expectations associated with sources of contamination and the need to restore, wherever practicable, contaminated groundwater to be suitable for its designated current and future uses.

Duration / Applicability of EI Determinations

EI Determinations status codes should remain in RCRIS national database ONLY as long as they remain true (i.e., RCRIS status codes must be changed when the regulatory authorities become aware of contrary information).

RCRA RECORDS CENTER
FACILITY Risdon Corp.
I.D. NO. CTD001168558
FILE LOC. R-13
OTHER #106983

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2. Is **groundwater** known or reasonably suspected to be **"contaminated"**¹ above appropriately protective "levels" (i.e., applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action, anywhere at, or from, the facility?

- ☒ If yes - continue after identifying key contaminants, citing appropriate "levels," and referencing supporting documentation.
- ☐ If no - skip to #8 and enter "YE" status code, after citing appropriate "levels," and referencing supporting documentation to demonstrate that groundwater is not "contaminated."
- ☐ If unknown - skip to #8 and enter "IN" status code.

Rationale and Reference(s):

The Risdon Corporation's Danbury facility consists of a former industrial plant located on approximately 11.5 acres of land along Old Newtown Road in Danbury, Connecticut (see Figure 1). The area is generally industrial/commercial with a few scattered residences. Based on investigation activities previously completed across the facility (36 groundwater monitoring wells, 25 years of groundwater quality data [1981 to 2006], and 14 years of active groundwater remediation), subsurface soils, soil vapor, and groundwater have been impacted by past releases of chlorinated volatile organic compounds (VOCs) and metals at two separate areas on the facility (referred to as the former Metals Finishing Area and Lagoon Area).

Since September 2003, an annual groundwater monitoring program consisting of the sampling and analyses of 10 monitoring wells for inorganics and 13 monitoring wells for VOCs has been conducted at the site. The last annual groundwater quality monitoring event was performed in August 2006. All groundwater data collected at the site has been incorporated into this evaluation. The locations of the monitoring and recovery wells are shown on Figure 2.

A groundwater hydraulic containment system operates continuously at the site, twenty-four hours a day. This system extracts VOC impacted groundwater from six hydraulic containment recovery wells (RW-1 through RW-6) installed along the downgradient property line. Monitoring of the hydraulic containment system has indicated that the system continues to be operating effectively, meeting its operational goals by capturing the VOC plume and effectively treating the extracted groundwater.

The predominant constituents of concern detected in groundwater across the site are chlorinated VOCs and inorganics. With respect to the chlorinated VOCs, the following compounds have been detected at the greatest frequency and at the highest concentrations in groundwater: 1,1,1-trichloroethane (1,1,1-TCA), trichloroethene (TCE), and tetrachloroethene (PCE). These compounds were reportedly used at the facility as degreasing agents. In addition to these three chlorinated VOCs, typical degradation products of these VOCs, including cis-1,2-dichloroethene (cis-1,2-DCE), 1,1-dichloroethene (1,1-DCE), and 1,1-dichloroethane (1,1-DCA), have also been detected frequently and at higher concentrations than other VOCs. The highest levels of chlorinated VOCs have been detected in the deep overburden and shallow, fractured/weathered bedrock, indicating that this layer appears to be the primary pathway for VOC migration in groundwater.

The groundwater monitoring results from the most recent sampling event (August 2006) indicate that the VOC and inorganic concentrations detected were generally consistent with previous sampling events, with the highest concentrations detected along the northern downgradient property line of the facility. There have been some minor

¹ Footnotes:

¹ "Contamination" and "contaminated" describes media containing contaminants (in any form, NAPL and/or dissolved, vapors, or solids, that are subject to RCRA) in concentrations in excess of appropriate "levels" (appropriate for the protection of the groundwater resource and its beneficial uses).

Supplemental Information to the September 20, 2006 Migration of Contaminated Groundwater Under Control Environmental Indicator

Question 2

The Risdon facility ceased operations in 2005 and the building is currently vacant.

Supplemental information includes the following documents:

- 2008 Annual Groundwater Monitoring, Risdon Corporation, Danbury, CT CTD001168558, dated September 4, 2008
- 2007 Annual Groundwater Monitoring, Risdon Corporation, Danbury, CT CTD001168558, dated August 30, 2007
- Interim Corrective Measures Groundwater Hydraulic Containment Semi Annual Status Reports Numbers 1-5 (most Status Report dated June 30, 2008)

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fluctuations in concentrations in wells over time, although the overall patterns remain consistent with the higher concentrations detected adjacent to and downgradient of the former Metals Finishing Area and Lagoon Area.

Groundwater at the site is classified as GB, and generally flows from south to north from a topographic high located behind the facility toward the Still River and wetlands area north of the facility. Appropriate "levels" (i.e., appropriate for the protection of the area's groundwater resource and its beneficial uses) used in this evaluation included: CTDEP Remediation Standard Regulations (RSRs) Volatilization criteria -industrial/commercial setting (Vol-I/C) for groundwater beneath the facility represented by wells screened across the water table surface; CTDEP RSRs Volatilization criteria – residential setting (Vol-Res) for groundwater off the property beneath residential properties represented by wells screened across the water table surface; and CTDEP RSRs Surface Water Protection Criteria (SWPC) for groundwater represented by wells installed off property and downgradient of the hydraulic containment system. A comparison of the site data to drinking water standards was not conducted due to the GB groundwater classification, no private or public water supply wells are located within the vicinity of the facility, and the availability of a municipal water supply.

In comparing the most recent results to the CTDEP RSR criteria, concentrations of 1,1-DCE, PCE, 1,1,1-TCA, TCE, and chloroform exceed the applicable CTDEP RSRs Volatilization Criteria and concentrations of 1,1-DCE, PCE, TCE, and cyanide exceed the Surface Water Protection Criteria in several monitoring wells. A summary of the groundwater results from September 2001 through August 2006 is presented in attached Table 1 (VOCs) and Table 2 (inorganics).

References:

RCRA Facility Investigation Report, January 1999.

Various Project Reports & Submittals Relating to the Corrective Action Activities at the Site, 1999-2006.

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3. Has the **migration** of contaminated groundwater **stabilized** (such that contaminated groundwater is expected to remain within "existing area of contaminated groundwater"²

as defined by the monitoring locations designated at the time of this determination)?

- ☒ If yes - continue, after presenting or referencing the physical evidence (e.g., groundwater sampling/measurement/migration barrier data) and rationale why contaminated groundwater is expected to remain within the (horizontal or vertical) dimensions of the "existing area of groundwater contamination"².
- ☐ If no (contaminated groundwater is observed or expected to migrate beyond the designated locations defining the "existing area of groundwater contamination"²) - skip to #8 and enter "NO" status code, after providing an explanation.
- ☐ If unknown - skip to #8 and enter "IN" status code.

Rationale and Reference(s):

As indicated previously, a groundwater hydraulic containment system operates continuously at the site, twenty-four hours a day. This system treats VOC impacted groundwater from hydraulic containment recovery wells installed along the downgradient property line. In August 2005, three new wells were added to the system (RW-4, RW-5, and RW-6) to complete the hydraulic containment well network; To aid in evaluating contaminant migration with groundwater flow, the following data is collected: water level measurements from on-site monitoring wells, recovery wells, and stream piezometers installed in the Still River; and groundwater samples for these wells for laboratory analyses.

Monthly monitoring of the hydraulic containment system since August 2005 has indicated that the system continues to be operating effectively, meeting its operational goals by capturing the VOC plume and effectively treating the extracted groundwater. Notable drawdown of the groundwater table at off-property wells, as a result of the groundwater extraction system, demonstrates the effectiveness of the system in preventing ~~contaminant~~ migration from the property (refer to June 20, 2006 Semi-Annual Status Report No. 2 Groundwater ICM Report).

A depiction of the groundwater flow field through the subsurface based on average pumping rates from the six recovery wells (August 2005 through August 2006) using backward particle tracking and the site's groundwater numerical model is presented on Figure 3. As shown on this figure, groundwater is effectively being contained on the facility.

In January 2006, a monitoring well (2ONR-MW1A) was installed off property adjacent to the Still River to assess the downgradient extent of the contaminant plume and potential discharge into the Still River. This well was screened within the overburden/till directly above the bedrock surface (primary flow path for contaminants on-site). No concentrations of VOCs or metals were detected in the groundwater sample collected from this well in February 2006.

² "existing area of contaminated groundwater" is an area (with horizontal and vertical dimensions) that has been verifiably demonstrated to contain all relevant groundwater contamination for this determination, and is defined by designated (monitoring) locations proximate to the outer perimeter of "contamination" that can and will be sampled/tested in the future to physically verify that all "contaminated" groundwater remains within this area, and that the further migration of "contaminated" groundwater is not occurring. Reasonable allowances in the proximity of the monitoring locations are permissible to incorporate formal remedy decisions (i.e., including public participation) allowing a limited area for natural attenuation.

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As presented in the response to Question 2, VOCs and inorganics have been detected in groundwater samples collected from off-property locations. However, the extent appears to be limited and the plume has not migrated downgradient to the Still River (refer to well 2ONR-MW1A data), nor outside the "existing area of groundwater contamination". It is anticipated that continued operation of the groundwater containment system will continue to reduce the concentrations of contaminants in downgradient groundwater by removing contaminant mass from the subsurface (from August 2005 to July 2006 approximately 390 pounds of VOCs were removed by this system), and by hydraulically containing the plume within the site boundaries.

Given this information, it is expected that the contaminated groundwater plume will remain within the current existing area (horizontal and vertical dimensions) of contaminated groundwater.

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4. Does "contaminated" groundwater **discharge** into **surface water** bodies?

☐ If yes - continue after identifying potentially affected surface water bodies.

☒ If no - skip to #7 (and enter a "YE" status code in #8, if #7 = yes) after providing an explanation and/or referencing documentation supporting that groundwater "contamination" does not enter surface water bodies.

☐ If unknown - skip to #8 and enter "IN" status code.

Rationale and Reference(s)

Groundwater across the site generally flows from south to north from a topographic high located behind the facility toward the Still River and wetlands area north of the facility. The Still River is classified by the State as a Class B river, which means that it is not used for drinking water supply, but can be used for agricultural or industrial supply, recreational uses, and fish and wildlife habitat. Photographs of the river are attached to this document.

Based on information discussed below, the river, in the vicinity of the facility, flows through a developed area consisting of industrial and residential properties and appears to have limited use. The CTDEP Boaters guide shows no listing for public boat launches on the Still River and based on visual inspections there were limited access points for boats. Given the narrowness and shallow depth of the river, only smaller vessels (i.e., canoes, etc.) could navigate the river at times of high water (see attached photographs). Visual inspection of the river in the vicinity of Old Newtown Road showed no signs of swimming such as beach areas, chairs on the banks, rope swings, or fishing activity such as worn paths along the banks or fishing line and other discarded fishing equipment. According to the CTDEP, the Still River is stocked with trout from Eagle Street in Danbury downstream to "the town linear park." This area is approximately 7 tenths of a mile downstream from the point at which the Still River crosses Old Newtown Road.

With respect to concentrations of VOCs in groundwater potentially discharging into the River, groundwater samples have been collected from two off-property locations positioned hydraulically downgradient between the facility and adjacent to the Still River (monitoring wells MW-14 along Broad Street and 2ONR-MW1A on the Old Newtown Road property). The well locations are shown on attached Figure 2. Based on the most recent groundwater quality data from these wells, no concentrations of any VOCs or inorganics exceeded CTDEP's Remediation Standard Regulations (RSRs) Surface Water Protection Criteria (SWPC). Concentrations of TCE have been detected in off-property well MW-15M in excess of the SWPC. This well is located inland directly across Old Newtown Road from the facility (see Figure 2).

In August 2005, the three new groundwater extraction wells installed along the downgradient property line of the facility initiated operation to create a series of extraction wells along the downgradient perimeter of the facility (see attached Figure 2). This enhanced remediation system will continue to prevent migration and further reduce the concentrations of VOCs migrating off of the facility.

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5. Is the **discharge** of "contaminated" groundwater into surface water likely to be "**insignificant**" (i.e., the maximum concentration³ of each contaminant discharging into surface water is less than 10 times their appropriate groundwater "level," and there are no other conditions (e.g., the nature, and number, of discharging contaminants, or environmental setting), which significantly increase the potential for unacceptable impacts to surface water, sediments, or eco-systems at these concentrations)?
- _____ If yes - skip to #7 (and enter "YE" status code in #8 if #7 = yes), after documenting: 1) the maximum known or reasonably suspected concentration³ of key contaminants discharged above their groundwater "level," the value of the appropriate "level(s)," and if there is evidence that the concentrations are increasing; and 2) provide a statement of professional judgment/explanation (or reference documentation) supporting that the discharge of groundwater contaminants into the surface water is not anticipated to have unacceptable impacts to the receiving surface water, sediments, or eco-system.
- _____ If no - (the discharge of "contaminated" groundwater into surface water is potentially significant) - continue after documenting: 1) the maximum known or reasonably suspected concentration³ of each contaminant discharged above its groundwater "level," the value of the appropriate "level(s)," and if there is evidence that the concentrations are increasing; and 2) for any contaminants discharging into surface water in concentrations³ greater than 100 times their appropriate groundwater "levels," the estimated total amount (mass in kg/yr) of each of these contaminants that are being discharged (loaded) into the surface water body (at the time of the determination), and identify if there is evidence that the amount of discharging contaminants is increasing.
- _____ If unknown - enter "IN" status code in #8.

Rationale and Reference(s)

³ As measured in groundwater prior to entry to the groundwater-surface water/sediment interaction (e.g., hyporheic) zone.

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6. Can the **discharge** of “contaminated” groundwater into surface water be shown to be “**currently acceptable**” (i.e., not cause impacts to surface water, sediments or eco-systems that should not be allowed to continue until a final remedy decision can be made and implemented⁴)?

- _____ If yes - continue after either: 1) identifying the Final Remedy decision incorporating these conditions, or other site-specific criteria (developed for the protection of the site’s surface water, sediments, and eco-systems), and referencing supporting documentation demonstrating that these criteria are not exceeded by the discharging groundwater; OR
- 2) providing or referencing an interim-assessment,⁵ appropriate to the potential for impact, that shows the discharge of groundwater contaminants into the surface water is (in the opinion of a trained specialists, including ecologist) adequately protective of receiving surface water, sediments, and eco-systems, until such time when a full assessment and final remedy decision can be made. Factors which should be considered in the interim-assessment (where appropriate to help identify the impact associated with discharging groundwater) include: surface water body size, flow, use/classification/habitats and contaminant loading limits, other sources of surface water/sediment contamination, surface water and sediment sample results and comparisons to available and appropriate surface water and sediment “levels,” as well as any other factors, such as effects on ecological receptors (e.g., via bio-assays/benthic surveys or site-specific ecological Risk Assessments), that the overseeing regulatory agency would deem appropriate for making the EI determination.
- _____ If no - (the discharge of “contaminated” groundwater can not be shown to be “**currently acceptable**”) - skip to #8 and enter “NO” status code, after documenting the currently unacceptable impacts to the surface water body, sediments, and/or eco-systems.
- _____ If unknown - skip to 8 and enter “IN” status code.

Rationale and Reference(s): _____

⁴ Note, because areas of inflowing groundwater can be critical habitats (e.g., nurseries or thermal refugia) for many species, appropriate specialist (e.g., ecologist) should be included in management decisions that could eliminate these areas by significantly altering or reversing groundwater flow pathways near surface water bodies.

⁵ The understanding of the impacts of contaminated groundwater discharges into surface water bodies is a rapidly developing field and reviewers are encouraged to look to the latest guidance for the appropriate methods and scale of demonstration to be reasonably certain that discharges are not causing currently unacceptable impacts to the surface waters, sediments or eco-systems.

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7. Will groundwater **monitoring** / measurement data (and surface water/sediment/ecological data, as necessary) be collected in the future to verify that contaminated groundwater has remained within the horizontal (or vertical, as necessary) dimensions of the "existing area of contaminated groundwater?"

☒ If yes - continue after providing or citing documentation for planned activities or future sampling/measurement events. Specifically identify the well/measurement locations which will be tested in the future to verify the expectation (identified in #3) that groundwater contamination will not be migrating horizontally (or vertically, as necessary) beyond the "existing area of groundwater contamination."

☐ If no - enter "NO" status code in #8.

☐ If unknown - enter "IN" status code in #8.

Rationale and Reference(s):

To verify that contaminated groundwater remains within the horizontal or vertical dimensions of the "existing area of contaminated groundwater", groundwater samples will continue to be collected on an annual basis from the following wells. The locations of the wells are shown on Figure 2. All groundwater samples will be collected following EPA low flow (low stress) sampling guidelines for the requested analytical parameters provided below.

Monitoring Well	Analysis		
	VOCs	Cyanide	13 Priority Pollutant Metals
MW-1	X	X	X
MW-2	X	X	X
MW-3	X	X	X
MW-8		X	X
MW-9	X		
MW-10	X	X	X
MW-11	X	X	X
MW-14	X		
MW-15 <i>M</i>	X	X	X
MW-111	X	X	X
MW-112	X		
MW-113		X	X
MW-508	X		
MW-508C	X		
MW-601B	X	X	X
2ONR-MW-1A	X		X
TOTALS	14	10	11

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**Supplemental Information to the September 20, 2006 Migration of Contaminated
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Question 7

A revised groundwater monitoring plan that includes semi-annual sampling will be submitted to EPA for review and approval following sign-off of this EI.

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8. Check the appropriate RCRIS status codes for the Migration of Contaminated Groundwater Under Control EI (event code CA750), and obtain Supervisor (or appropriate Manager) signature and date on the EI determination below (attach appropriate supporting documentation as well as a map of the facility).

☒ YE - Yes, "Migration of Contaminated Groundwater Under Control" has been verified. Based on a review of the information contained in this EI determination, it has been determined that the "Migration of Contaminated Groundwater" is "Under Control" at the Risdon Corporation facility, EPA ID # CTD001168558, located at 15 Old Newtown Road, Danbury, CT. Specifically, this determination indicates that the migration of "contaminated" groundwater is under control, and that monitoring will be conducted to confirm that contaminated groundwater remains within the "existing area of contaminated groundwater". This determination will be re-evaluated when the Agency becomes aware of significant changes at the facility.

☐ NO - Unacceptable migration of contaminated groundwater is observed or expected.

☐ IN - More information is needed to make a determination.

Completed by Jeffrey A. Hamel, LEP, LSP

Woodard & Curran Inc. for Crown Cork & Seal
Senior Project Manager

CAROLYN J. CASEY
RCRA FACILITY MANAGER
Carolyn J. Casey
9/16/08

Date September 20, 2006

Supervisor

[Signature]
Chief, RCRA Corrective Action

Date 9/22/08

Locations where References may be found:

US EPA New England, Office of Site Remediation and Restoration, Boston, MA

Contact telephone and e-mail numbers

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TABLE 1
SUMMARY OF VOLATILE ORGANIC COMPOUNDS DETECTED IN GROUNDWATER
September 2001 - August 2006

Risdon Corporation- Danbury, CT

Monitoring Wells	Sample Date	VOCs Detected (ug/l)								
		Bromodichloromethane	Chloroform	1,1-Dichloroethane	1,1-Dichloroethene	cis-1,2-Dichloroethene	Tetrachloroethene	1,1,1-Trichloroethane	Trichloroethene	Total VOCs
MW-1 ²	9/21/01	<0.5	0.84	<0.5	<0.5	<0.5	<0.5	1.1	1.4	3.34
	10/15/02	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	1.9	3.2	5.10
	9/10/03	0.63	4.50	<0.50	<0.5	<0.5	<0.5	0.5	1.7	7.33
	9/15/04	<0.5	<0.75	<0.75	<0.5	<0.5	<0.5	0.5	1.1	1.60
	9/28/05	<0.5	0.86	<0.75	<0.5	<0.5	<0.5	0.85	1.0	2.71
	8/1/06	<2	3.30	<3	<2	<2	310	<2	52	365.3
MW-2	9/19/01	<0.5	<0.5	1.1	<0.5	<0.5	<0.5	26.0	<0.5	27.1
	10/15/02	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	1.2	1.1	2.3
	9/9/03	<0.5	<0.5	3.1	5.6	<0.5	<0.5	710	3.4	722.1
	9/15/04	<10	<10	17	14	<10	<10	880	<10	911
	9/28/05	<10	<15	20	32	<10	<10	4,100	15	4,167
	8/2/06	<0.5	<0.75	7.6	0.78	<0.5	1.2	56	28	130
MW-3	9/19/01	<100	<100	<100	320	170	<100	1,200	13,000	14,690
	10/15/02	<50	<50	<50	170	140	<50	900	15,000	16,210
	9/9/03	<200	<200	<200	<200	<200	<200	5,200	860	6,060
	9/15/04	<50	<75	<75	110	220	<50	470	2,900	3,700
	9/28/05	<50	<75	<75	200	160	<50	3,000	8,200	11,560
	8/3/06	<25	<38	<38	49	440	<25	710	3,000	4,199
MW-6	9/19/01	<200	<200	<200	<200	<200	<200	21,000	750	21,750
MW-8	9/19/01	<100	<100	<100	<100	<100	<100	9,800	170	9,970
MW-9 ¹	9/19/01	<1000	<1000	<1000	17,000	<1000	<1000	58,000	4,500	79,500
	10/15/02	NS	NS	NS	NS	NS	NS	NS	NS	NS
	9/9/03	<1000	<1000	<1000	12,000	<1000	<1000	32,000	11,000	55,000
	9/15/04	<0.5	4.1 J	120 J	1,900	50 J	7.4 J	21,000	2,200	25,282
	9/28/05	<250	<380	530	28,000	<250	<250	65,000	7,900	101,430
	8/3/06	<1,000	<1,500	<1,500	25,000	<1,000	<1,000	55,000	7,900	87,900
MW-10	9/19/01	<10	<10	12	300	<10	<10	960	180	1,452
	10/15/02	<0.5	<0.5	0.84	10	<0.5	<0.5	17	6.6	34
	9/9/03	<0.5	<0.5	14	120	2	<0.5	290	56	482
	9/15/04	<5	<7.5	14	100	<5	<5	450	46	610
	9/27/05	<1.2	<1.9	3.6	62	<1.2	<1.2	120	33	219
	8/2/06	<1.2	<1.9	19	160	2.7	<1.2	440	76	698
MW-11	9/19/01	<20	<20	84	370	340	<20	1,100	1,900	3,794
	10/15/02	<25	<25	40	340	250	<25	910	1,800	3,340
	9/9/03	<25	<25	<25	37	150	<25	280	2,400	2,867
	9/15/04	<20	<30	<30	25	25	<20	980	300	1,330
	9/27/05	<12	<19	25	210	40	<12	6,100	560	6,935
	8/2/06	<50	89	100	1,100	220	<50	3,700	2,400	7,609
MW-12	9/19/01	<200	<200	<200	460	<200	<200	26,000	1,400	27,860
MW-13	9/19/01	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	0
MW-14	9/21/01	<0.5	0.89	3.5	<0.50	4.9	<0.50	10.0	11.0	30.29
	10/16/02	<0.5	1.8	2.1	<0.5	2.5	<0.5	9.7	7.9	24
	9/11/03	0.90	9.8	3.7	<0.5	2.5	<0.5	11.0	7.2	35.1
	9/15/04	<1.0	<1.5	11	3.9	31	<1.0	70.0	73	188.9
	9/28/05	<1	<1.5	27	21	36	<1	550	140 J	634
	8/2/06	<2.5	<3.8	18	14	17	<2.5	340	80	469
MW-15	9/19/01	<20	<20	<20	20	74	<20	60	1,300	1,454
	10/17/02	<12	<12	<12	<12	47	<12	32	1,200	1,279
	9/11/03	<12	<12	<12	<12	37	<12	24	850	911
	9/15/04	<10	<15	<15	<10	31	<10	20	670	721
	9/28/05	<50	<75	<75	<50	110	<50	81	3,300	3,491
	8/2/06	<10	<15	18	49	160	35	110	4,600	4,972
MW-110A	9/20/01	<2	<2	<2	76	12	320	220	120	748
MW-111	9/20/01	<1000	<1000	<1000	<1000	<1000	1900 J	2,800	60,000	64,700
	10/17/02	<200	<200	<200	<200	<200	920	870	25,000	26,790
	9/10/03	<500	<500	<500	<500	<500	1,100	2,200	67,000	70,300
	9/15/04	<1000	<1500	<1500	<1000	<1000	1,200	2,500	77,000	80,700
	9/28/05	<500	<750	<750	<500	<500	1,000	1,000	33,000	35,000
	8/2/06	<500	<750	<750	<500	<500	1,100	1,900	58,000	61,000

TABLE 1
SUMMARY OF VOLATILE ORGANIC COMPOUNDS DETECTED IN GROUNDWATER
September 2001 - August 2006

Risdon Corporation- Danbury, CT

Monitoring Wells	Sample Date	VOCs Detected (ug/l)								
		Bromodichloromethane	Chloroform	1,1-Dichloroethane	1,1-Dichloroethene	cis-1,2-Dichloroethene	Tetrachloroethene	1,1,1-Trichloroethane	Trichloroethene	Total VOCs
MW-112 ²	9/20/01	<500	<500	<500	<500	740	<500	<500	26,000	26,740
	10/17/02	<250	<250	<250	<250	280	<250	<250	14,000	14,280
	9/10/03	<200	<200	<200	<200	280	<200	550(J)	23,000	23,830
	9/15/04	<200	<300	<300	<200	610	<200	500	20,000	21,110
	9/28/05	<2	<3	<3	<2	8.8	<2	3.4	130	142
	8/2/06	<2	4	55	110	1,600	180	530	23,000	25,536
MW-113	9/20/01	<10	<10	<10	<10	<10	620	<10	36	656
MW-304	9/19/01	<1,000	<1,000	<1,000	2,400	<1,000	<1,000	56,000	<1,000	58,400
MW-501	9/21/01	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	3.5	3.5
MW-503A	9/20/01	<5	<5	<5	23	10	140	140	190	503
MW-504	8/1/06	<200	<300	<300	<200	2,800	<200	<200	13,000	15,800
MW-505	9/21/01	<5	<5	8	72	16	<5	250	390	736
MW-506	9/20/01	<10	<10	<10	120	<10	<10	230	790	1,140
MW-507	9/21/01	<0.5	<0.5	1.6	<0.5	<0.5	<0.5	4.8	0.91	7.31
MW-508	9/20/01	<50	<50	<50	<50	52	<50	<50	2,000	2,052
	10/17/02	<10	<10	<10	<10	21	<10	19	970	1,010
	9/10/03	<100	<100	<100	<100	480	<100	170	8,800	9,450
	9/15/04	<100	<150	<150	<100	210	<100	300	10,000	10,510
	8/2/06	<10	<15	<15	<10	44	11	21	960	1,036
MW-508C	9/20/01	<500	<500	<500	820	620	<500	660	23,000	25,100
	10/17/02	<1,000	<1,000	<1,000	<1,000	<1,000	<1,000	<1,000	34,000	34,000
	9/10/03	<500	<500	<500	890	540	510	590	37,000	39,530
	9/15/04	<500	<750	<750	580	560	<500	700	32,000	33,840
	9/28/05	<500	<750	<750	600	<500	<500	520	26,000	27,120
	8/2/06	<250	<380	<380	480	420	440	<250	18,000	19,340
MW-601B	9/20/01	<25	<25	<25	380	60	1,000	1,100	3,100	5,640
	10/17/02	<50	<50	<50	330	<50	850	1,200	3,000	5,380
	9/10/03	<50	<50	<50	410	<50	780	1,100	2,800	5,090
	9/15/04	<25	<38	<38	540	39	890	1,600	2,300	5,369
	9/28/05	<25	<38	<38	920	29	1,600	4,600	3,400	10,549
	8/2/06	<25	<38	<38	680	42	860	2,800	2,600	6,982
RVW-104	8/1/06	<250	<380	<380	<250	<250	34,000	<250	7,300	41,300
RVW-108A	8/1/06	<500	<750	<750	3,700	<500	850	33,000	21,000	58,550
2ONR-MW1A	2/10/06	<0.5	<0.75	<0.75	<0.5	<0.5	<0.5	<0.5	<0.5	ND
SWPC	-	NE	14,100	NE	96	NE	88	62,000	2,340	NE
Vol-1/C	-	73	62	41,000	920	11,000	810	16,000	67	NE
Vol-Res	-	2.3	26	3,000	190	830	340	6,500	27	NE

Notes/Abbreviations:

1. In addition to the VOCs reported above, the following VOCs, with concentrations in parentheses, were detected in MW-09 during the September 2004 sampling: 1,1,2-TCA (22J); trans 1,2-DCE (12J); MTBE (8J); methylene chloride (6.4J); and vinyl chloride (3.2J).

2. During the September 2005 sampling event, acetone was detected in MW-112 at a concentration of 180 ug/l and chloroform was detected in MW-01 at a concentration of 0.86 ug/l.

ug/l = micrograms per liter (parts per billion)

J = estimated, since field duplicate precision criteria were not met.

SWPC = CTDEP Remediation Standard Regulations (RSRs) Surface Water Protection Criteria

Vol-1/C and Res = CTDEP Remediation Standard Regulations (RSRs) Volatilization Criteria Industrial/Commercial (IC) or residential (Res) settings - Proposed Revisions March 2003

Shaded cells indicate reported concentrations greater than a RSR criteria

NE = No standard has been established for this particular compound in the CTDEP RSRs

NS = Not sampled; MW-9 was inaccessible during the October 2002 monitoring period.

TABLE 2
SUMMARY OF INORGANICS DETECTED IN GROUNDWATER
September 2001 - August 2006

Risdon Corporation - Danbury, CT

Monitoring Wells	Sample Date	Inorganics Detected (mg/l)								
		Total Cyanide	Total Arsenic	Total Beryllium	Total Cadmium	Total Chromium	Total Copper	Total Nickel	Total Silver	Total Zinc
MW-1	Sep-01	<0.005	<0.004	<0.004	<0.005	<0.01	<0.01	<0.025	<0.007	<0.05
	Jan-02	<0.005	<0.004	<0.004	<0.005	<0.01	<0.01	<0.025	<0.007	<0.05
	Apr-02	<0.005	<0.004	<0.004	<0.005	<0.01	<0.01	<0.025	<0.007	<0.05
	Jul-02	<0.005	<0.004	<0.004	<0.005	<0.01	<0.01	<0.025	<0.007	<0.05
	Oct-02	<0.005	<0.004	<0.004	<0.005	<0.01	<0.01	<0.025	<0.010	<0.05
	Sep-03	<0.005	<0.004	<0.004	<0.005	<0.01	<0.01	<0.025	<0.007	<0.05
	Sep-04	<0.005	<0.004	<0.004	<0.005	<0.01	<0.01	<0.025	<0.007	<0.05
	Sep-05	<0.005 UJ	<0.004	<0.004	<0.005	<0.01	0.01	<0.025	<0.007	<0.05
MW-2	Aug-06	<0.01	<0.005	<0.004	<0.005	<0.01	<0.01	<0.025	<0.007	<0.05
	Sep-01	<0.005	<0.004	<0.004	<0.005	<0.01	0.01	<0.025	<0.007	<0.05
	Jan-02	<0.005	<0.004	<0.004	<0.005	<0.01	0.01	<0.025	<0.007	<0.05
	Apr-02	0.005 UJ	<0.004	<0.004	<0.005	<0.01	0.01	<0.025	<0.007	<0.05
	Jul-02	<0.005	<0.004	<0.004	<0.005	<0.01	0.01	<0.025	<0.010	<0.05
	Oct-02	<0.005	<0.004	<0.004	<0.005	<0.01	0.01 U	<0.025	<0.007	<0.05
	Sep-03	<0.005	<0.004	<0.004	<0.005	<0.01	0.01	<0.025	<0.007	<0.05
	Sep-04	<0.005	<0.004	<0.004	<0.005	<0.01	0.03	<0.025	<0.007	<0.05
MW-3	Sep-05	<0.005 UJ	<0.004	<0.004	<0.005	<0.01	0.03	<0.025	<0.007	<0.05
	Aug-06	<0.01	<0.005	<0.004	<0.005	<0.01	0.01	<0.025	<0.007	<0.05
	Sep-01	<0.005	<0.004	<0.004	<0.005	<0.01	0.11	<0.025	<0.007	<0.05
	Jan-02	<0.005	<0.004	<0.004	<0.005	<0.01	0.08	<0.025	<0.007	<0.05
	Apr-02	0.005 UJ	<0.004	<0.004	<0.005	<0.01	0.11	<0.025	<0.010	<0.05
	Jul-02	<0.005	<0.004	<0.004	<0.005	<0.01	0.11	<0.025	<0.007	<0.05
	Oct-02	<0.005	<0.004	<0.004	<0.005	<0.01	0.1 U	<0.025	<0.007	<0.05
	Sep-03	<0.005	<0.004	<0.004	<0.005	<0.01	0.13	<0.025	<0.007	<0.05
MW-8	Sep-04	<0.005	<0.004	<0.004	<0.005	<0.01	0.10	<0.025	<0.007	<0.05
	Sep-05	<0.005 UJ	<0.004	<0.004	<0.005	<0.01	0.07	<0.025	<0.007	<0.05
	Aug-06	<0.01	<0.005	<0.004	<0.005	<0.01	0.09	<0.025	<0.007	<0.05
	Sep-01	<0.005	<0.004	<0.004	<0.005	<0.01	0.06	<0.025	<0.007	<0.05
	Jan-02	NA	<0.004	NA	NA	NA	NA	NA	<0.010	NA
	Apr-02	0.005 UJ	<0.004	<0.004	<0.005	<0.01	0.2	<0.025	<0.007	<0.05
	Jul-02	0.007 U	<0.004	<0.004	<0.005	<0.01	0.16	<0.025	<0.007	<0.05
	Oct-02	<0.005	<0.004	<0.004	<0.005	<0.01	0.14 U	<0.025	<0.007	<0.05
MW-10	Sep-03	0.005 J	0.004	<0.004	<0.005	<0.01	0.22	<0.025	<0.007	<0.05
	Sep-04	<0.005	<0.004	<0.004	<0.005	<0.01	0.14	<0.025	<0.007	<0.05
	Sep-05	0.007 J	<0.004	<0.004	<0.005	<0.01	0.18	<0.025	<0.007	<0.05
	Aug-06	<0.01	<0.005	<0.004	<0.005	<0.01	0.14	<0.025	<0.007	<0.05
	Sep-01	0.038	<0.004	<0.004	<0.005	<0.01	<0.01	<0.025	<0.010	<0.05
	Jan-02	0.01	<0.004	<0.004	<0.005	0.01	0.01	<0.025	<0.007	<0.05
	Apr-02	0.005 UJ	<0.004	<0.004	<0.005	0.02	0.02	<0.025	<0.007	<0.05
	Jul-02	0.01 U	<0.004	<0.004	<0.005	<0.01	<0.01	<0.025	<0.007	<0.05
MW-11	Oct-02	<0.005	<0.004	<0.004	<0.005	<0.01	<0.01	<0.025	<0.007	<0.05
	Sep-03	0.009(J)	<0.004	<0.004	<0.005	<0.01	<0.01	<0.025	<0.007	<0.05
	Sep-04	0.012	<0.004	<0.004	<0.005	<0.01	0.02	<0.025	<0.010	<0.05
	Sep-05	0.01 J	<0.004	<0.004	<0.005	0.02	0.05	<0.025	<0.007	<0.05
	Aug-06	<0.01	<0.005	<0.004	<0.005	<0.01	0.01	<0.025	<0.007	<0.05
	Sep-01	0.01	<0.004	<0.004	<0.005	<0.01	0.12	<0.025	<0.007	<0.05
	Jan-02	<0.005	<0.004	<0.004	<0.005	<0.01	0.16	<0.025	<0.007	<0.05
	Apr-02	0.005 UJ	<0.004	<0.004	<0.005	<0.01	0.02	<0.025	<0.007	<0.05
	Jul-02	<0.005	<0.004	<0.004	<0.005	<0.01	0.12	<0.025	<0.007	<0.05
	Oct-02	0.007	<0.004	<0.004	<0.005	<0.01	0.14 U	<0.025	<0.010	<0.05
	Sep-03	<0.005	<0.004	<0.004	<0.005	<0.01	0.11	<0.025	0.008	<0.05
	Sep-04	<0.005	<0.004	<0.004	<0.005	<0.01	0.08	<0.025	<0.007	<0.05
	Sep-05	0.005 J	<0.004	<0.004	<0.005	<0.01	0.06	<0.025	<0.007	<0.05
	Aug-06	<0.01	<0.005	<0.004	<0.005	<0.01	0.09	<0.025	<0.007	<0.05

TABLE 2
SUMMARY OF INORGANICS DETECTED IN GROUNDWATER

September 2001 - August 2006

Risdon Corporation - Danbury, CT

Monitoring Wells	Sample Date	Inorganics Detected (mg/l)								
		Total Cyanide	Total Arsenic	Total Beryllium	Total Cadmium	Total Chromium	Total Copper	Total Nickel	Total Silver	Total Zinc
MW-15	Sep-01	0.191	<0.004	<0.004	<0.005	<0.01	<0.01	<0.025	<0.007	<0.05
	Jan-02	0.184	<0.004	<0.004	<0.005	<0.01	<0.01	<0.025	<0.007	<0.05
	Apr-02	0.186	<0.004	<0.004	<0.005	<0.01	<0.01	<0.025	<0.007	<0.05
	Jul-02	0.186	<0.004	<0.004	<0.005	<0.01	<0.01	<0.025	<0.007	<0.05
	Oct-02	0.132	<0.004	<0.004	<0.005	<0.01	<0.01	<0.025	<0.010	<0.05
	Sep-03	0.139 J	<0.004	<0.004	<0.005	<0.01	<0.01	<0.025	<0.007	<0.05
	Sep-04	0.161	<0.004	<0.004	<0.005	<0.01	<0.01	<0.025	<0.007	<0.05
	Sep-05	0.222 J	<0.004	<0.004	<0.005	<0.01	<0.01	<0.025	<0.007	<0.05
	Aug-06	0.163	<0.005	<0.005	<0.005	<0.01	0.01	<0.025	<0.007	<0.05
MW-111	Sep-01	0.009	<0.004	<0.004	<0.005	<0.01	1.3	0.109	<0.007	0.7
	Jan-02	<0.005	<0.004	<0.004	<0.005	<0.01	1.3	0.106	<0.007	0.66
	Apr-02	<0.005	<0.004	<0.004	<0.005	<0.01	1.3	0.128	<0.007	0.72
	Jul-02	0.008 U	<0.004	<0.004	<0.005	<0.01	0.87	0.102	<0.007	0.56
	Oct-02	0.006	<0.004	<0.004	<0.005	<0.01	1.4	0.114	<0.010	0.72
	Sep-03	0.008 J	<0.004	<0.004	<0.005	<0.01	0.16	0.035	<0.007	0.19
	Sep-04	0.023	<0.004	<0.004	<0.005	<0.01	0.05	<0.025	<0.007	0.06
	Sep-05	0.011 J	<0.004	<0.004	<0.005	<0.01	0.02	<0.025	<0.007	<0.05
	Aug-06	0.012	<0.005	<0.004	<0.005	<0.01	0.02	<0.025	<0.007	<0.05
MW-113	Sep-01	0.021	<0.004	0.005	<0.005	<0.01	6.5	2.02	<0.007	1.7
	Jan-02	<0.005	<0.004	0.006	<0.005	<0.01	7.2	2.06	<0.007	2.0
	Apr-02	0.017 J	<0.004	0.005	<0.005	<0.01	8.2	2.52	0.012	2.3
	Jul-02	0.013 U	<0.004	0.008	<0.005	<0.01	10	2.67	0.022	2.7
	Oct-02	0.011	<0.004	0.008	<0.005	<0.01	8.2	2.14	0.018	2.3
	Sep-03	0.039 J	<0.004	0.005	<0.005	<0.01	5.5	1.84	<0.007	1.4
	Sep-04	0.096	<0.004	0.005	<0.005	<0.01	6.0	1.96	<0.007	1.4
	Sep-05	0.115 J	<0.004	<0.005	<0.005	<0.01	5.6	1.98	<0.007	1.3
	Aug-06	0.08	0.007	<0.004	<0.005	0.03	7.4	2.18	<0.007	1.4
MW-504	Aug-06	<0.01	<0.005	<0.004	<0.005	<0.01	<0.01	<0.025	<0.007	<0.05
MW-601B	Sep-01	0.015	<0.004	0.007	0.005	<0.01	8	0.434	<0.007	4.0
	Jan-02	<0.005	<0.004	0.006	0.005	<0.01	6.7	0.355	<0.007	3.4
	Apr-02	0.015 J	0.004	0.005	<0.005	<0.01	6.4	0.347	<0.007	3.1
	Jul-02	0.016 U	<0.004	0.006	<0.005	<0.01	5.8	0.334	<0.007	2.9
	Oct-02	0.014	<0.004	0.006	<0.005	<0.01	5.8	0.342	<0.010	3.1
	Sep-03	0.018 J	<0.004	0.006	0.005	<0.01	5.5	0.385	<0.010	3.3
	Sep-04	0.038	<0.004	0.007	<0.005	<0.01	6.1	0.460	<0.010	3.4
	Sep-05	0.021 J	0.011	0.011	0.005	<0.01	9.8	1.130	<0.007	4.2
	Aug-06	<0.01	<0.005	0.007	<0.005	<0.01	6.1	0.796	<0.007	2.8
RVW-104	Aug-06	0.023	<0.005	<0.004	<0.005	0.01	0.04	<0.025	<0.007	<0.05
RW-108A	Aug-06	0.062	0.013	0.026	0.005	0.02	27	0.09	0.049	12
2ONR-MW1A	Feb-06	--	<0.005	<0.005	<0.005	<0.01	<0.01	<0.025	<0.007	<0.05
SWPC		0.052	0.004	0.004	0.006	NE	0.048	0.88	0.012	0.123

Notes/Abbreviations:

Bold value indicates a detection at or above the laboratory's reported detection limit.

Shaded cells indicate reported concentration is above SWPC.

mg/l = milligrams per liter

SWPC = CTDEP Remediation Standard Regulations (RSRs) Surface Water Protection Criteria

NE = None established by CTDEP; SWPC for trivalent chromium is 1.2 mg/l ; SWPC for hexavalent chromium is 0.110 mg/l.

NA = Not Analyzed; monitoring well MW-08 was not accessible for sampling during the January 2002 event.

J = Results qualified as estimated values due to high recoveries in MS/MSD samples.

UJ = Results qualified as estimated values due to failed recoveries in MSD sample.

U = Result qualified as undetected because of equipment blank contamination.



Figure 3
Backward particle tracking through flow field based on average pumping rates
August 2005 – August 2006



Date: 9/3/03

Description:

**Still River, Upstream
of Old Newtown
Road, Bridge Facing
Downstream.**

View: Looking North



Date: 9/3/03

Description:

**Still River on Old
Newtown Road
Bridge, Facing
Downstream.**

**View: Looking
Northwest**



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September 4, 2008

Ms. Carolyn Casey
US EPA Region 1
1 Congress Street
Suite 1100-HBT
Boston, MA 02114-2023

Re: 2008 Annual Groundwater Monitoring
Risdon Corporation, Danbury, CT
CTD001168558

Dear Ms. Casey:

This letter has been prepared to summarize the results of the 2008 annual groundwater monitoring performed at the former Risdon facility located at 15 Old Newtown Road in Danbury, Connecticut. Specifically, at your request, the data is presented in this letter to evaluate this most recent sampling round as it pertains to the Environmental Indicator (EI) CA 750 Migration of Contaminated Groundwater Under Control. On September 21, 2006, a revised EI CA 750 was submitted to the Agency; however, a "No" code is currently listed for the facility with respect to this EI.

A review of the current groundwater analytical data indicates that concentrations of both VOCs and inorganics have decreased significantly since monitoring began in the late 1980's/ early 1990's. In addition, notable decreases in concentrations have been observed in select areas within the past few years with the operation of the hydraulic containment groundwater treatment system. The overall decrease in VOC and inorganic levels over time and the decrease and/or stability of contaminants over the past few years demonstrates the effectiveness of the hydraulic containment groundwater treatment system and that migration of contaminated groundwater has stabilized and is under control. Therefore, it is our opinion that the continued operation of the hydraulic containment groundwater treatment system (as part of the on-property remedy) and the most recent round of groundwater data support the finding that the migration of contaminated groundwater has stabilized, such that the contaminated groundwater is expected to remain within the "existing area of contaminated groundwater".

During the 2008 annual groundwater monitoring activities, groundwater samples were collected between August 12 and 14, 2008 from 20 monitoring wells. The groundwater monitoring was performed in accordance with the September 2005 Operation, Maintenance and Monitoring (OM&M) Plan for the hydraulic containment groundwater treatment system operating at the site. In addition to the sixteen wells sampled as part of the annual monitoring event, three additional wells from the former metal finishing area [(MFA) RW-108A, RVW-104 and MW-503A] were sampled to evaluate current conditions within the source areas and upgradient well MW-507 was also sampled, per the request of USEPA during the comment period of the preparation of the on-property Remedial Action Plan (RAP). Groundwater samples were analyzed for volatile organic compounds (VOCs) via EPA Method 8260B with CT Reasonable Confidence Protocols (CT RCP), cyanide and/or the 13 priority pollutant metals. The following table indicates the analysis performed for the specific monitoring wells sampled. The locations of the wells are shown on Figure 1.



Groundwater Quality Monitoring Analytical Testing Summary

Monitoring Well	ANALYSIS		
	VOCs CT RCP 8260B	Total Cyanide	13 Priority Pollutant Metals
CA 750 Monitoring Wells			
MW-1	X	X	X
MW-2	X	X	X
MW-3	X	X	X
MW-8	X	X	X
MW-9	X		
MW-10	X	X	X
MW-11	X	X	X
MW-14	X		
MW-15M	X	X	X
MW-111	X	X	X
MW-112	X		
MW-113	X	X	X
MW-508	X		
MW-508C	X		
MW-601B	X	X	X
2ONR-MW-1A	X	X	X
MFA Wells			
RW-108A	X	X	X
RVW-104	X	X	X
MW-503A	X	X	X
Other			
MW-507	X		
TOTALS	20	14	14

All monitoring wells were purged and sampled consistent with USEPA Region 1 low stress (low flow) purging and sampling techniques. After collection, the groundwater samples were placed on ice, logged on a chain-of-custody form and transported to Alpha Woods Hole Laboratories (Alpha) in Westborough, Massachusetts. The laboratory analytical results collected as part of the 2008 annual groundwater monitoring event are discussed below and summarized in the attached Table 1 (Inorganics) and Table 2 (VOCs). Further details, including field chemistry data, data validation, and laboratory data sheets, will be included in the next Remedy Operations semi-annual status report.

Inorganics

A summary of the laboratory analytical results for metals and cyanide collected since 2001 is provided in Table 1. For the most part, concentrations of inorganics on-site continue to be consistent with previous data, with concentrations stable and/or decreasing over time.

Cyanide, arsenic, beryllium, cadmium, chromium, copper, lead, mercury, nickel, silver and zinc were detected in at least one groundwater sample during this monitoring event. Antimony, selenium, and thallium were not detected at or above the laboratory's minimum reporting limits. Within the 14 wells



sampled for inorganics, copper continues to be the most common inorganic detected in site groundwater (10 wells), followed by cyanide (5 wells), chromium, nickel and zinc (3 wells), lead (2 wells), and arsenic, beryllium, cadmium, mercury, and silver, which were only detected in one well (within the MFA source area). Similar to previous results, the highest concentrations of metals were detected in the samples collected from MW-113, MW-601B, and RW-108A. All of these wells are located within or hydraulically downgradient of the MFA. Of note, downgradient wells MW-113 and MW-601B show a general decline in copper and zinc concentrations since 2001, as shown in the attached plots.

For general comparison purposes and given there are no uses of groundwater on the site (drinking or other uses), the recent data from wells along the property boundary were screened against the Connecticut Department of Environmental Protection (CTDEP) Remediation Standard Regulations (RSRs) surface water protection criteria (SWPCs). An exceedence of the SWPC was detected in four of the eight boundary wells and in one of the off-property wells. This is consistent with the 2007 monitoring event, with the exception of the presence of lead at MW-10 just above the laboratory detection limit and SWPC. The only other location where lead was measured above the laboratory detection limit was at MFA source area well RW-108A.

The wells with current levels above the SWPC include: MW-3 (copper), MW-10 (lead), MW-113 (copper, nickel, zinc), MW-601B (copper and zinc), and off-property well MW-15M (cyanide). No exceedences were detected in MW-2, MW-11, and MW-111 and no inorganics were detected above the reporting limits in downgradient off-property well ZONR-MW-1A. The concentrations of copper in MW-11 and copper and zinc in MW-111 have decreased steadily over the years and remain below the CTDEP RSRs SWPCs for at least the past couple of years.

Volatile Organic Compounds

The VOC results from the groundwater samples collected in August 2008, as well as those collected since September 2001, are summarized in Table 2. The following six VOCs continued to be the most frequently detected compounds above the laboratory's minimum reporting limits: 1,1-Dichloroethane (1,1-DCA), 1,1-Dichloroethene (1,1-DCE), cis-1,2-dichloroethene (cis-1,2-DCE), Tetrachloroethene (PCE), 1,1,1-Trichloroethane (1,1,1-TCA), and Trichloroethene (TCE).

The 2008 VOC groundwater results have remained fairly consistent with previous results (within and downgradient of the former MFA) or have decreased (within and downgradient of the former Lagoon area). The highest concentrations of VOCs continue to be detected within and immediately downgradient of the MFA and adjacent to the former Lagoon area with the highest total VOC concentrations detected in source area and immediately downgradient monitoring wells MW-111 (72,600 ug/l), RW-108A (71,100 ug/l), RVW-104 (57,290 ug/l), and MW-9 (53,000 ug/l). These results are consistent with previous sampling events, with an overall decrease since monitoring began in the late 1980's.

Within and immediately downgradient of the former Lagoon Area, concentrations of VOCs in groundwater have shown a notable decline (especially MW-2, MW-3, MW-9, and MW-11) over the past few years since the upgrade of the hydraulic containment groundwater treatment system in 2005. VOC levels within and immediately downgradient of the former MFA have remained consistent with historical results and/or declined over time. Concentrations continue to fluctuate at select wells downgradient of the former MFA (MW-111, MW-112, and MW-508C); however, they are consistent within the range of previously detected historical results and are within the immediate capture zones of nearby extraction wells.

For general comparison purposes and given there are no uses of groundwater in the area (drinking or other uses), the recent data was screened against the CTDEP RSR Industrial/ Commercial (I/C)



Volatilization Criteria and SWPC. An exceedence of the CTDEP RSR I/C Volatilization Criteria was detected in 12 of the 20 wells sampled for VOCs, with exceedences of TCE (12 wells), PCE (5 wells), 1,1,1-TCA (2 wells), and 1,1-DCE (2 wells). It should be noted that concentrations of TCE declined below the I/C volatilization criteria in Lagoon area wells MW-8 and MW-10. As you are aware, construction of the sub-slab vapor control system (SSDS) is currently underway for the facility building and SSDS' have been operational at the two adjacent residences (2 Broad Street and 2 Old Newtown Road) to eliminate the vapor intrusion to indoor air pathway to potential current receptors and an environmental land use restriction will be recorded, as part of the on-property remedial action to restrict new buildings in other areas of the property with Volatilization Criteria exceedences.

An exceedence of the SWPC was detected in six of the thirteen boundary and off-property wells analyzed, a decrease in number from the previous year. The six wells with current levels above the SWPC include: MW-15M (TCE), MW-111 (TCE, PCE), MW-112 (TCE, PCE), MW-113 (PCE), MW-508C (PCE, TCE, 1,1-DCE) and MW-601B (PCE, 1,1-DCE). No exceedences were detected in MW-2, MW-3, MW-10, MW-11, MW-14, MW-508, and 2ONR-MW-1A. It should be noted that concentrations of 1,1-DCE have declined in monitoring wells MW-10 and MW-11 below the SWPC. In addition, no VOCs were detected in excess of the SWPC in the two monitoring wells installed closest to the Still River (e.g., points of compliance wells – MW-14 and 2ONR-MW-1A).

As discussed in previous submittals, the overall VOC concentrations in downgradient, off-property well MW-15M have decreased significantly since the early 1990's; however, a slight increase in total VOC levels was observed in 2005 – 2006. Concentrations stabilized in 2007 throughout early-2008 and recent data (from August 2008) demonstrates that the concentrations have declined. This is illustrated in the attached plot of total VOCs over time at this well. The increase in VOC levels at this well in 2005 - 2006 is attributable to operational issues with the treatment systems prior to the start-up of the enhanced hydraulic containment system in 2005, as well as issues in 2005 – 2006 with precipitate build-up within the treatment system (causing system shutdown) and corrosion of the well pump at RW-6 during this timeframe [causing reduced flow and shutdown of the pump for a month (in March/April 2006)]. Since the upgrade of the treatment system to prevent the precipitate build-up (August 2006) and the replacement of well pump RW-6 with one compatible with the groundwater chemistry in that area (April 2006), these issues have been addressed and the system has operated continuously and effectively. Current VOC levels in groundwater at this location have declined from the past few sampling events.

In general, VOC concentrations in groundwater have decreased significantly since monitoring began in the late 1980's/ early 1990's. In addition, notable decreases in VOC concentrations within the past few years have been observed in the vicinity and immediately downgradient of the former Lagoon Area. This is further illustrated by the reduction in the number of boundary and/or off-property monitoring wells where there have been exceedences of applicable RSR criteria. Although levels of VOCs in groundwater fluctuate within wells downgradient of the former MFA, the concentrations are consistent with those measured in the past, thereby demonstrating that conditions have not changed and remain stable. In addition, the concentrations in off-property well MW-15M have begun to decline.

Groundwater Extraction and Treatment System

On August 31, 2005, the enhanced property line hydraulic containment groundwater system initiated operations at the site. The system continuously extracts VOC impacted groundwater from six hydraulic containment recovery wells (RW-1 through RW-6), treats the groundwater, and discharges the treated groundwater to the sanitary sewer. In 2008, this system was incorporated into the selected remedial action for on-property conditions.

From August 31, 2005 to August 28, 2008, the enhanced system has been operational for a total of 2.85 years, extracted approximately 15.5 millions of gallons of groundwater, and has removed



approximately 1,325 pounds of VOCs from the subsurface. The total flow rate of the system has ranged from 6 to 18 gallons per minute (gpm) with an average flow rate (with the recovery wells cycling) of 10 gpm since August 2005.

Monitoring of the hydraulic containment system has indicated that the system continues to be operating effectively, meeting its operational goals by capturing the VOC plume and effectively treating the extracted groundwater.

Summary

Similar to years past, the results of the 2008 annual groundwater monitoring have demonstrated an overall decreasing trend of contaminant levels in groundwater across the site since monitoring began in the late 1980's/ early 1990's. In addition, notable decreases in VOC concentrations within the past few years have been observed in the vicinity and immediately downgradient of the former Lagoon Area. Although current levels of inorganics and VOCs along the downgradient property boundary remain above the CTDEP RSRs SWPC in select wells, concentrations have declined over time and the number of locations with an exceedence has decreased as well.

The overall decrease in VOC levels over time and the decrease and/or stability of contaminants over the past couple years demonstrates the effectiveness of the hydraulic containment groundwater treatment system and that migration of contaminated groundwater has stabilized and is under control.

It is also noted that, as we have discussed, additional groundwater characterization data will be collected in the area northeast of the property pending off-property access to further determine the nature and extent of any facility-related groundwater contamination in these areas. However, regardless of these results, the impacted groundwater can be considered stabilized or under control in this area, as well, given the proximity of the large wetlands area or groundwater discharge point located approximately 650 feet from the property.

Continued groundwater monitoring will be conducted to monitor and confirm the results in accordance with the OM&M Plan.

If you have any questions regarding the information provided, please contact me at 978-557-8150.

Sincerely,

WOODARD & CURRAN INC.

Jeffrey A. Hamel, LSP, LEP
Senior Project Manager

CMR
97001.25

Enclosures: Tables 1 and 2
Figure 1
Trend Plots for copper, zinc and total VOCs

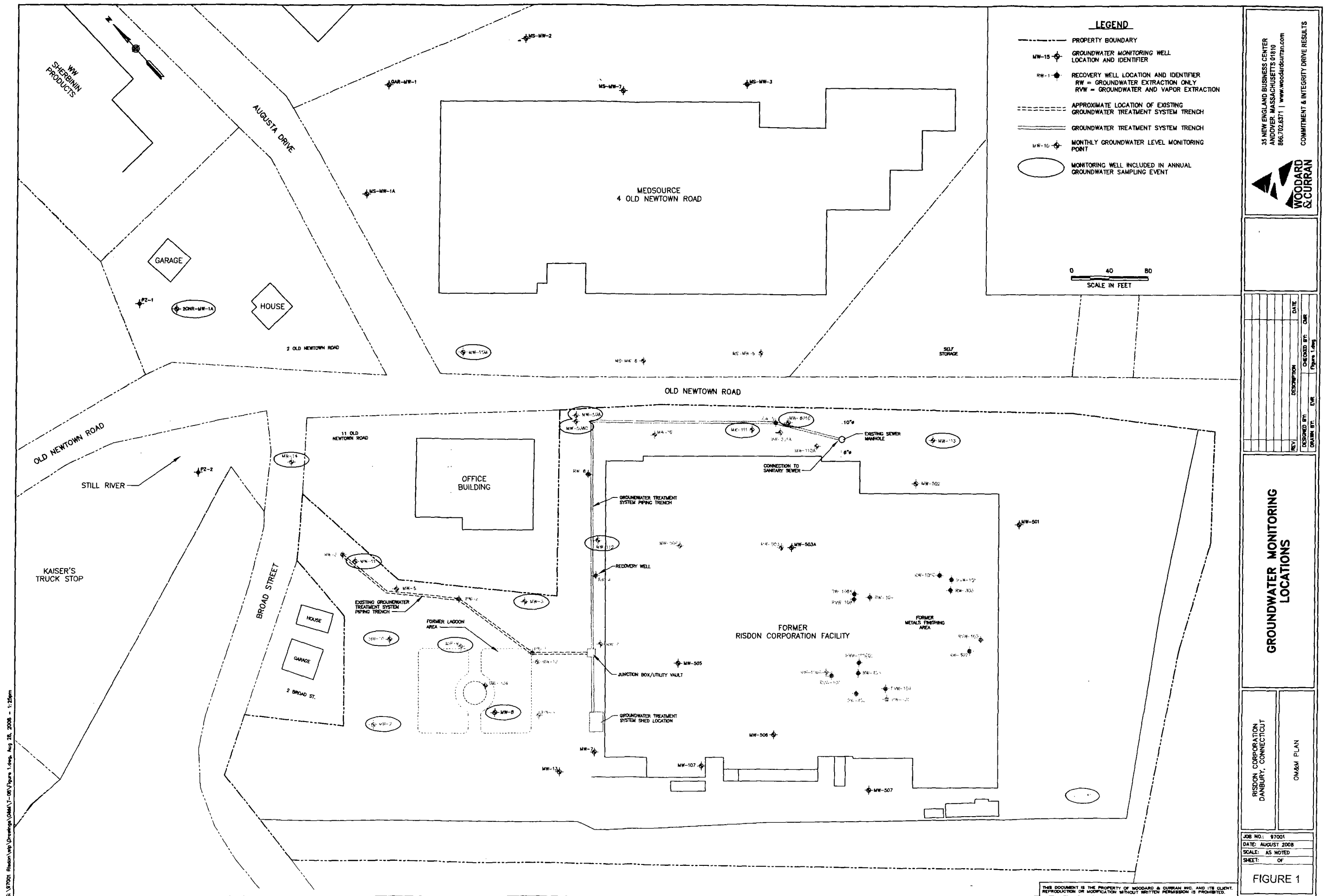


TABLE 1
SUMMARY OF INORGANICS DETECTED IN GROUNDWATER

September 2001 - August 2008
Risdon ICM Treatment System, Danbury, Connecticut

Monitoring Wells	Sample Date	Inorganics Detected (mg/l)									
		Total Cyanide	Total Arsenic	Total Beryllium	Total Cadmium	Total Chromium	Total Copper	Total Lead	Total Nickel	Total Silver	Total Zinc
SWPC		0.052	0.004	0.004	0.006	NE	0.05	0.01	0.88	0.012	0.123
MW-1	Sep-01	<0.005	<0.004	<0.004	<0.005	<0.01	<0.01	<0.01	<0.025	<0.007	<0.05
	Jan-02	<0.005	<0.004	<0.004	<0.005	<0.01	<0.01	<0.01	<0.025	<0.007	<0.05
	Apr-02	<0.005	<0.004	<0.004	<0.005	<0.01	<0.01	<0.01	<0.025	<0.007	<0.05
	Jul-02	<0.005	<0.004	<0.004	<0.005	<0.01	<0.01	<0.01	<0.025	<0.007	<0.05
	Oct-02	<0.005	<0.004	<0.004	<0.005	<0.01	<0.01	<0.01	<0.025	<0.010	<0.05
	Sep-03	<0.005	<0.004	<0.004	<0.005	<0.01	<0.01	<0.01	<0.025	<0.007	<0.05
	Sep-04	<0.005	<0.004	<0.004	<0.005	<0.01	<0.01	<0.01	<0.025	<0.007	<0.05
	Sep-05	<0.005 UJ	<0.004	<0.004	<0.005	<0.01	0.01	<0.01	<0.025	<0.007	<0.05
	Aug-06	<0.01	<0.005	<0.004	<0.005	<0.01	<0.01	<0.01	<0.025	<0.007	<0.05
	Aug-07	<0.01	<0.005	<0.005	<0.005	<0.01	<0.01 UJ	<0.01	<0.025	<0.007	<0.05
	Aug-08	<0.01	<0.005	<0.005	<0.005	<0.01	<0.01	<0.01	<0.025	<0.007	<0.05
MW-2*	Sep-01	<0.005	<0.004	<0.004	<0.005	<0.01	0.01	<0.01	<0.025	<0.007	<0.05
	Jan-02	<0.005	<0.004	<0.004	<0.005	<0.01	0.01	<0.01	<0.025	<0.007	<0.05
	Apr-02	0.005 UJ	<0.004	<0.004	<0.005	<0.01	0.01	<0.01	<0.025	<0.007	<0.05
	Jul-02	<0.005	<0.004	<0.004	<0.005	<0.01	0.01	<0.01	<0.025	<0.010	<0.05
	Oct-02	<0.005	<0.004	<0.004	<0.005	<0.01	0.01 U	<0.01	<0.025	<0.007	<0.05
	Sep-03	<0.005	<0.004	<0.004	<0.005	<0.01	0.01	<0.01	<0.025	<0.007	<0.05
	Sep-04	<0.005	<0.004	<0.004	<0.005	<0.01	0.03	<0.01	<0.025	<0.007	<0.05
	Sep-05	<0.005 UJ	<0.004	<0.004	<0.005	<0.01	0.03	<0.01	<0.025	<0.007	<0.05
	Aug-06	<0.01	<0.005	<0.004	<0.005	<0.01	0.01	<0.01	<0.025	<0.007	<0.05
	Aug-07	<0.01	<0.005	<0.005	<0.005	<0.01	0.011	<0.01	<0.025	<0.007	<0.05
	Aug-08	<0.01	<0.005	<0.005	<0.005	0.01	0.039	<0.01	<0.025	<0.007	<0.05

TABLE 1
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September 2001 - August 2008
Risdon ICM Treatment System, Danbury, Connecticut

Monitoring Wells	Sample Date	Inorganics Detected (mg/l)									
		Total Cyanide	Total Arsenic	Total Beryllium	Total Cadmium	Total Chromium	Total Copper	Total Lead	Total Nickel	Total Silver	Total Zinc
SWPC		0.052	0.004	0.004	0.006	NE	0.05	0.01	0.88	0.012	0.123
MW-3*	Sep-01	<0.005	<0.004	<0.004	<0.005	<0.01	0.11	<0.01	<0.025	<0.007	<0.05
	Jan-02	<0.005	<0.004	<0.004	<0.005	<0.01	0.08	<0.01	<0.025	<0.007	<0.05
	Apr-02	0.005 UJ	<0.004	<0.004	<0.005	<0.01	0.11	<0.01	<0.025	<0.010	<0.05
	Jul-02	<0.005	<0.004	<0.004	<0.005	<0.01	0.11	<0.01	<0.025	<0.007	<0.05
	Oct-02	<0.005	<0.004	<0.004	<0.005	<0.01	0.1 U	<0.01	<0.025	<0.007	<0.05
	Sep-03	<0.005	<0.004	<0.004	<0.005	<0.01	0.13	<0.01	<0.025	<0.007	<0.05
	Sep-04	<0.005	<0.004	<0.004	<0.005	<0.01	0.10	<0.01	<0.025	<0.007	<0.05
	Sep-05	<0.005 UJ	<0.004	<0.004	<0.005	<0.01	0.07	<0.01	<0.025	<0.007	<0.05
	Aug-06	<0.01	<0.005	<0.004	<0.005	<0.01	0.09	<0.01	<0.025	<0.007	<0.05
	Aug-07	<0.01	<0.005	<0.005	<0.005	<0.01	0.079	<0.01	<0.025	<0.007	<0.05
	Aug-08	<0.01	<0.005	<0.005	<0.005	<0.01	0.079	<0.01	<0.025	<0.007	<0.05
MW-8	Sep-01	<0.005	<0.004	<0.004	<0.005	<0.01	0.06	<0.01	<0.025	<0.007	<0.05
	Jan-02	NA	<0.004	NA	NA	NA	NA	<0.01	NA	<0.010	NA
	Apr-02	0.005 UJ	<0.004	<0.004	<0.005	<0.01	0.20	<0.01	<0.025	<0.007	<0.05
	Jul-02	0.007 U	<0.004	<0.004	<0.005	<0.01	0.16	<0.01	<0.025	<0.007	<0.05
	Oct-02	<0.005	<0.004	<0.004	<0.005	<0.01	0.14 U	<0.01	<0.025	<0.007	<0.05
	Sep-03	0.005 J	0.004	<0.004	<0.005	<0.01	0.22	<0.01	<0.025	<0.007	<0.05
	Sep-04	<0.005	<0.004	<0.004	<0.005	<0.01	0.14	<0.01	<0.025	<0.007	<0.05
	Sep-05	0.007 J	<0.004	<0.004	<0.005	<0.01	0.18	<0.01	<0.025	<0.007	<0.05
	Aug-06	<0.01	<0.005	<0.004	<0.005	<0.01	0.14	<0.01	<0.025	<0.007	<0.05
	Aug-07	<0.01	<0.005	<0.005	<0.005	<0.01	0.065	<0.01	<0.025	<0.007	<0.05
	Aug-08	<0.01	<0.005	<0.005	<0.005	<0.01	0.141	<0.01	<0.025	<0.007	<0.05

TABLE 1
SUMMARY OF INORGANICS DETECTED IN GROUNDWATER

September 2001 - August 2008
Risdon ICM Treatment System, Danbury, Connecticut

Monitoring Wells	Sample Date	Inorganics Detected (mg/l)									
		Total Cyanide	Total Arsenic	Total Beryllium	Total Cadmium	Total Chromium	Total Copper	Total Lead	Total Nickel	Total Silver	Total Zinc
SWPC		0.052	0.004	0.004	0.006	NE	0.05	0.01	0.88	0.012	0.123
MW-10*	Sep-01	0.038	<0.004	<0.004	<0.005	<0.01	<0.01	<0.01	<0.025	<0.010	<0.05
	Jan-02	0.01	<0.004	<0.004	<0.005	0.01	0.01	<0.01	<0.025	<0.007	<0.05
	Apr-02	0.005 UJ	<0.004	<0.004	<0.005	0.02	0.02	<0.01	<0.025	<0.007	<0.05
	Jul-02	0.01 U	<0.004	<0.004	<0.005	<0.01	<0.01	<0.01	<0.025	<0.007	<0.05
	Oct-02	<0.005	<0.004	<0.004	<0.005	<0.01	<0.01	<0.01	<0.025	<0.007	<0.05
	Sep-03	0.009(J)	<0.004	<0.004	<0.005	<0.01	<0.01	<0.01	<0.025	<0.007	<0.05
	Sep-04	0.012	<0.004	<0.004	<0.005	<0.01	0.02	<0.01	<0.025	<0.010	<0.05
	Sep-05	0.01 J	<0.004	<0.004	<0.005	0.02	0.05	<0.01	<0.025	<0.007	<0.05
	Aug-06	<0.01	<0.005	<0.004	<0.005	<0.01	0.01	<0.01	<0.025	<0.007	<0.05
	Aug-07	<0.01	<0.005	<0.005	<0.005	<0.01	<0.01	<0.01	<0.025	<0.007	<0.05
	Aug-08	<0.01	<0.005	<0.005	<0.005	0.02	0.046	0.012	<0.025	<0.007	<0.05
MW-11*	Sep-01	0.01	<0.004	<0.004	<0.005	<0.01	0.12	<0.01	<0.025	<0.007	<0.05
	Jan-02	<0.005	<0.004	<0.004	<0.005	<0.01	0.16	<0.01	<0.025	<0.007	<0.05
	Apr-02	0.005 UJ	<0.004	<0.004	<0.005	<0.01	0.02	<0.01	<0.025	<0.007	<0.05
	Jul-02	<0.005	<0.004	<0.004	<0.005	<0.01	0.12	<0.01	<0.025	<0.007	<0.05
	Oct-02	0.007	<0.004	<0.004	<0.005	<0.01	0.14 U	<0.01	<0.025	<0.010	<0.05
	Sep-03	<0.005	<0.004	<0.004	<0.005	<0.01	0.11	<0.01	<0.025	0.008	<0.05
	Sep-04	<0.005	<0.004	<0.004	<0.005	<0.01	0.08	<0.01	<0.025	<0.007	<0.05
	Sep-05	0.005 J	<0.004	<0.004	<0.005	<0.01	0.06	<0.01	<0.025	<0.007	<0.05
	Aug-06	<0.01	<0.005	<0.004	<0.005	<0.01	0.09	<0.01	<0.025	<0.007	<0.05
	Aug-07	<0.01	<0.005	<0.005	<0.005	<0.01	0.03	<0.01	<0.025	<0.007	<0.05
	Aug-08	<0.01	<0.005	<0.005	<0.005	<0.01	0.039	<0.01	<0.025	<0.007	<0.05

TABLE 1
SUMMARY OF INORGANICS DETECTED IN GROUNDWATER

September 2001 - August 2008
Risdon ICM Treatment System, Danbury, Connecticut

Monitoring Wells	Sample Date	Inorganics Detected (mg/l)									
		Total Cyanide	Total Arsenic	Total Beryllium	Total Cadmium	Total Chromium	Total Copper	Total Lead	Total Nickel	Total Silver	Total Zinc
SWPC		0.052	0.004	0.004	0.006	NE	0.05	0.01	0.88	0.012	0.123
MW-15M*	Sep-01	0.191	<0.004	<0.004	<0.005	<0.01	<0.01	<0.01	<0.025	<0.007	<0.05
	Jan-02	0.184	<0.004	<0.004	<0.005	<0.01	<0.01	<0.01	<0.025	<0.007	<0.05
	Apr-02	0.186	<0.004	<0.004	<0.005	<0.01	<0.01	<0.01	<0.025	<0.007	<0.05
	Jul-02	0.186	<0.004	<0.004	<0.005	<0.01	<0.01	<0.01	<0.025	<0.007	<0.05
	Oct-02	0.132	<0.004	<0.004	<0.005	<0.01	<0.01	<0.01	<0.025	<0.010	<0.05
	Sep-03	0.139 J	<0.004	<0.004	<0.005	<0.01	<0.01	<0.01	<0.025	<0.007	<0.05
	Sep-04	0.161	<0.004	<0.004	<0.005	<0.01	<0.01	<0.01	<0.025	<0.007	<0.05
	Sep-05	0.222 J	<0.004	<0.004	<0.005	<0.01	<0.01	<0.01	<0.025	<0.007	<0.05
	Aug-06	0.163	<0.005	<0.005	<0.005	<0.01	0.01	<0.01	<0.025	<0.007	<0.05
	Aug-07	0.159	<0.005	<0.005	<0.005	<0.01	<0.01 UJ	<0.01	<0.025	<0.007	<0.05
	Aug-08	0.159	<0.005	<0.005	<0.005	<0.01	<0.01	<0.01	<0.025	<0.007	<0.05
MW-111*	Sep-01	0.009	<0.004	<0.004	<0.005	<0.01	1.30	<0.01	0.109	<0.007	0.7
	Jan-02	<0.005	<0.004	<0.004	<0.005	<0.01	1.30	<0.01	0.106	<0.007	0.66
	Apr-02	<0.005	<0.004	<0.004	<0.005	<0.01	1.30	<0.01	0.128	<0.007	0.72
	Jul-02	0.008 U	<0.004	<0.004	<0.005	<0.01	0.87	<0.01	0.102	<0.007	0.56
	Oct-02	0.006	<0.004	<0.004	<0.005	<0.01	1.40	<0.01	0.114	<0.010	0.72
	Sep-03	0.008 J	<0.004	<0.004	<0.005	<0.01	0.16	<0.01	0.035	<0.007	0.19
	Sep-04	0.023	<0.004	<0.004	<0.005	<0.01	0.05	<0.01	<0.025	<0.007	0.06
	Sep-05	0.011J	<0.004	<0.004	<0.005	<0.01	0.02	<0.01	<0.025	<0.007	<0.05
	Aug-06	0.012	<0.005	<0.004	<0.005	<0.01	0.02	<0.01	<0.025	<0.007	<0.05
	Aug-07	<0.01	<0.005	<0.005	<0.005	<0.01	<0.01 UJ	<0.01	<0.025	<0.007	<0.05
	Aug-08	0.012	<0.005	<0.005	<0.005	<0.01	<0.01	<0.01	<0.025	<0.007	<0.05

TABLE 1
SUMMARY OF INORGANICS DETECTED IN GROUNDWATER

September 2001 - August 2008
Risdon ICM Treatment System, Danbury, Connecticut

Monitoring Wells	Sample Date	Inorganics Detected (mg/l)									
		Total Cyanide	Total Arsenic	Total Beryllium	Total Cadmium	Total Chromium	Total Copper	Total Lead	Total Nickel	Total Silver	Total Zinc
SWPC		0.052	0.004	0.004	0.006	NE	0.05	0.01	0.88	0.012	0.123
MW-113*	Sep-01	0.021	<0.004	0.005	<0.005	<0.01	6.50	<0.01	2.02	<0.007	1.7
	Jan-02	<0.005	<0.004	0.006	<0.005	<0.01	7.20	<0.01	2.06	<0.007	2.0
	Apr-02	0.017 J	<0.004	0.005	<0.005	<0.01	8.20	<0.01	2.52	0.012	2.3
	Jul-02	0.013 U	<0.004	0.008	<0.005	<0.01	10.00	<0.01	2.67	0.022	2.7
	Oct-02	0.011	<0.004	0.008	<0.005	<0.01	8.20	<0.01	2.14	0.018	2.3
	Sep-03	0.039 J	<0.004	0.005	<0.005	<0.01	5.50	<0.01	1.84	<0.007	1.4
	Sep-04	0.096	<0.004	0.005	<0.005	<0.01	6.00	<0.01	1.96	<0.007	1.4
	Sep-05	0.115 J	<0.004	<0.005	<0.005	<0.01	5.60	<0.01	1.98	<0.007	1.3
	Aug-06	0.08	0.007	<0.004	<0.005	0.03	7.40	0.06	2.18	<0.007	1.4
	Aug-07	0.025	<0.005	<0.005	<0.005	<0.01	3.12 J	<0.01	1.84	<0.007	0.979
	Aug-08	<0.01	<0.005	<0.005	<0.005	<0.01	1.81	<0.01	1.59	<0.007	0.766
MW-503A	Aug-07	<0.01	<0.005	<0.005	<0.005	<0.01	0.036	<0.01	<0.025	<0.007	<0.05
	Aug-08	<0.01	<0.005	<0.005	<0.005	<0.01	0.025	<0.01	<0.025	<0.007	<0.05
MW-504	Aug-06	<0.01	<0.005	<0.004	<0.005	<0.01	<0.01	<0.01	<0.025	<0.007	<0.05
MW-601B*	Sep-01	0.015	<0.004	0.007	0.005	<0.01	8.00	<0.01	0.434	<0.007	4.0
	Jan-02	<0.005	<0.004	0.006	0.005	<0.01	6.70	<0.01	0.355	<0.007	3.4
	Apr-02	0.015 J	0.004	0.005	<0.005	<0.01	6.40	<0.01	0.347	<0.007	3.1
	Jul-02	0.016 U	<0.004	0.006	<0.005	<0.01	5.80	<0.01	0.334	<0.007	2.9
	Oct-02	0.014	<0.004	0.006	<0.005	<0.01	5.80	<0.01	0.342	<0.010	3.1
	Sep-03	0.018 J	<0.004	0.006	0.005	<0.01	5.50	<0.01	0.385	<0.010	3.3
	Sep-04	0.038	<0.004	0.007	<0.005	<0.01	6.10	<0.01	0.460	<0.010	3.4
	Sep-05	0.021 J	0.011	0.011	0.005	<0.01	9.80	<0.01	1.130	<0.007	4.2
	Aug-06	<0.01	<0.005	0.007	<0.005	<0.01	6.10	<0.01	0.796	<0.007	2.8
	Aug-07	0.031	<0.005	<0.005	<0.005	<0.01	4.10 J	<0.01	0.633	<0.007	2.05
	Aug-08	0.025	<0.005	<0.005	<0.005	<0.01	3.82	<0.01	0.568	<0.007	1.84

TABLE 1
SUMMARY OF INORGANICS DETECTED IN GROUNDWATER

September 2001 - August 2008
Risdon ICM Treatment System, Danbury, Connecticut

Monitoring Wells	Sample Date	Inorganics Detected (mg/l)									
		Total Cyanide	Total Arsenic	Total Beryllium	Total Cadmium	Total Chromium	Total Copper	Total Lead	Total Nickel	Total Silver	Total Zinc
SWPC		0.052	0.004	0.004	0.006	NE	0.05	0.01	0.88	0.012	0.123
RVW-104 **	Aug-06	0.023	<0.005	<0.004	<0.005	0.01	0.04	<0.01	<0.025	<0.007	<0.05
	Aug-07	0.18	<0.005	<0.005	<0.005	0.02	0.494	<0.01	<0.025	0.013	0.054
	Aug-08	0.065	<0.005	<0.005	<0.005	0.01	0.063	<0.01	<0.025	<0.007	<0.05
RW-108A	Aug-06	0.062	0.013	0.026	0.005	0.02	27.0	0.09	0.09	0.049	12
	Aug-07	0.039	0.011	0.027	0.005	0.01	23.9	0.05	1.44	<0.007	13.9
	Aug-08	0.1 J	0.011	0.025	0.006	<0.01	18.9	0.044	1.61	0.014	6.25
20NR-MW1A*	Feb-06	--	<0.005	<0.005	<0.005	<0.01	<0.01	<0.01	<0.025	<0.007	<0.05
	Aug-07	<0.01	<0.005	<0.005	<0.005	<0.01	<0.01 UJ	<0.01	<0.025	<0.007	<0.05
	Aug-08	<0.01	<0.005	<0.005	<0.005	<0.01	<0.01	<0.01	<0.025	<0.007	<0.05

Notes/Abbreviations:

Bold value indicates a detection at or above the laboratory's reported detection limit.

Shaded cells indicate reported concentration within a downgradient property boundary well or off-property well is above the SWPC.

* indicates well is located along downgradient property boundary or off-property

** Mercury was detected in this well on three occasions, January 2002 at 0.0018 mg/l, August 2007 at 0.0025 mg/l and August 2008 at 0.0002 mg/l.

mg/l = milligrams per liter

SWPC = CTDEP Remediation Standard Regulations (RSRs) Surface Water Protection Criteria

NE = None established by CTDEP; SWPC for trivalent chromium is 1.2 mg/l ; SWPC for hexavalent chromium is 0.110 mg/l.

NA = Not Analyzed; monitoring well MW-08 was not accessible for sampling during the January 2002 event.

J = Results qualified as estimated values

UJ = Results qualified as estimated values due to failed recoveries in MSD sample.

U = Result qualified as undetected because of equipment blank contamination.

TABLE 2: SUMMARY OF VOLATILE ORGANIC COMPOUNDS DETECTED IN GROUNDWATER

September 2001 - August 2008
Hydraulic Containment Groundwater Treatment System
Risdon - Danbury, Connecticut

Monitoring Wells	Sample Date	VOCs Detected (ug/l)						
		1,1-Dichloroethane	1,1-Dichloroethene	cis-1,2-Dichloroethene	Tetrachloroethene	1,1,1-Trichloroethane	Trichloroethene	Total VOCs
SWPC	-	NE	96	NE	88	62,000	2,340	NE
Vol-I/C	-	41,000	920	11,000	810	16,000	67	NE
MW-1	9/21/01	<0.5	<0.5	<0.5	<0.5	1.1	1.4	3.34
	10/15/02	<0.5	<0.5	<0.5	<0.5	1.9	3.2	5.10
	9/10/03	<0.50	<0.5	<0.5	<0.5	0.5	1.7	7.33
	9/15/04	<0.75	<0.5	<0.5	<0.5	0.5	1.1	1.60
	9/28/05	<0.75	<0.5	<0.5	<0.5	0.85	1.0	2.71
	8/1/06	<3	<2	<2	310	<2	52	365.3
	11/13/06	<0.75	<0.5	<0.5	<0.5	<0.5	0.97	9.6
	8/8/07	<0.75	<0.5	<0.5	<0.5	<0.5	0.82	1.8
	8/12/08	<0.75	<0.5	<0.5	<0.5	<0.5	<0.5	ND
MW-2*	9/19/01	1.1	<0.5	<0.5	<0.5	26.0	<0.5	27.1
	10/15/02	<0.5	<0.5	<0.5	<0.5	1.2	1.1	2.3
	9/9/03	3.1	5.6	<0.5	<0.5	710	3.4	722.1
	9/15/04	17	14	<10	<10	880	<10	911
	9/28/05	20	32	<10	<10	4,100	15	4,167
	8/2/06	7.6	0.78	<0.5	1.2	56	28	130
	8/7/07	2.5	<0.5	<0.5	0.64	9.7	<0.5	13
	8/12/08	<0.75	<0.5	<0.5	<0.5	4.8	<0.5	4.8
MW-3*	9/19/01	<100	320	170	<100	1,200	13,000	14,690
	10/15/02	<50	170	140	<50	900	15,000	16,210
	9/9/03	<200	<200	<200	<200	5,200	860	6,060
	9/15/04	<75	110	220	<50	470	2,900	3,700
	9/28/05	<75	200	160	<50	3,000	8,200	11,560
	8/3/06	<38	49	440	<25	710	3,000	4,199
	8/7/07	6.1	33	180	2.6	290	930	1,442
	8/14/08	<19	56	80	<12	76	1,300	1,512

TABLE 2: SUMMARY OF VOLATILE ORGANIC COMPOUNDS DETECTED IN GROUNDWATER

September 2001 - August 2008

Hydraulic Containment Groundwater Treatment System

Risdon - Danbury, Connecticut

Monitoring Wells	Sample Date	VOCs Detected (ug/l)						
		1,1-Dichloroethane	1,1-Dichloroethene	cis-1,2-Dichloroethene	Tetrachloroethene	1,1,1-Trichloroethane	Trichloroethene	Total VOCs
SWPC	-	NE	96	NE	88	62,000	2,340	NE
Vol-I/C	-	41,000	920	11,000	810	16,000	67	NE
MW-6	9/19/01	<200	<200	<200	<200	21,000	750	21,750
	8/7/07	<300	<200	<200	<200	13,000	490	13,490
MW-7	8/7/07	<0.75	<0.5	<0.5	<0.5	<0.5	1	1
MW-8	9/19/01	<100	<100	<100	<100	9,800	170	9,970
	8/7/07	<75	90	<50	<50	6,500	89	6,679
	8/12/08	<38	120	<25	<25	5,000	53	5,173
MW-9	9/19/01	<1000	17,000	<1,000	<1,000	58,000	4,500	79,500
	9/9/03	<1000	12,000	<1,000	<1,000	32,000	11,000	55,000
	9/15/04	120 J	1,900	50 J	7.4 J	21,000	2,200	25,277
	9/28/05	530	28,000	<250	<250	65,000	7,900	101,430
	8/3/06	<1,500	25,000	<1,000	<1,000	55,000	7,900	87,900
	8/7/07	<750	23,000	<500	<500	50,000	7,400	80,400
	8/12/08	<750	14,000	<500	<500	37,000	2,000	53,000
MW-10* ¹	9/19/01	12	300	<10	<10	960	180	1,452
	10/15/02	0.84	10	<0.5	<0.5	17	6.6	34
	9/9/03	14	120	2	<0.5	290	56	482
	9/15/04	14	100	<5	<5	450	46	610
	9/27/05	3.6	62	<1.2	<1.2	120	33	219
	8/2/06	19	160	2.7	<1.2	440	76	698
	8/7/07	12	320	<5	<5	440	170	942
	8/12/08	<0.75	0.77	<0.5	<0.5	1.8	<0.5	10.1

TABLE 2: SUMMARY OF VOLATILE ORGANIC COMPOUNDS DETECTED IN GROUNDWATER

September 2001 - August 2008
Hydraulic Containment Groundwater Treatment System
Risdon - Danbury, Connecticut

Monitoring Wells	Sample Date	VOCs Detected (ug/l)						
		1,1-Dichloroethane	1,1-Dichloroethene	cis-1,2-Dichloroethene	Tetrachloroethene	1,1,1-Trichloroethane	Trichloroethene	Total VOCs
SWPC	-	NE	96	NE	88	62,000	2,340	NE
Vol-I/C	-	41,000	920	11,000	810	16,000	67	NE
MW-11*	9/19/01	84	370	340	<20	1,100	1,900	3,794
	10/15/02	40	340	250	<25	910	1,800	3,340
	9/9/03	<25	37	150	<25	280	2,400	2,867
	9/15/04	<30	25	25	<20	980	300	1,330
	9/27/05	25	210	40	<12	6,100	560	6,935
	8/2/06	100	1,100	220	<50	3,700	2,400	7,609
	8/7/07	22	190	78	<10	790	610	1,690
	8/12/08	3.8	26	15	<1	120	94	259
MW-12	9/19/01	<200	460	<200	<200	26,000	1,400	27,860
	8/7/07	<150	140	<100	<100	9,200	550	9,890
MW-13	9/19/01	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	ND
MW-14*	9/21/01	3.5	<0.50	4.9	<0.5	10.0	11.0	30.29
	10/16/02	2.1	<0.5	2.5	<0.5	9.7	7.9	24
	9/11/03	3.7	<0.5	2.5	<0.5	11.0	7.2	35.1
	9/15/04	11	3.9	31	<1.0	70.0	73	188.9
	9/28/05	27	21	36	<1	550	140 J	774
	8/2/06	18	14	17	<2.5	340 J	80 J	469
	8/7/07	13	8.5	16	3	130	56	227
	8/13/08	11	6.4	12	<1	91	43	163

TABLE 2: SUMMARY OF VOLATILE ORGANIC COMPOUNDS DETECTED IN GROUNDWATER

September 2001 - August 2008
Hydraulic Containment Groundwater Treatment System
Risdon - Danbury, Connecticut

Monitoring Wells	Sample Date	VOCs Detected (ug/l)						
		1,1-Dichloroethane	1,1-Dichloroethene	cis-1,2-Dichloroethene	Tetrachloroethene	1,1,1-Trichloroethane	Trichloroethene	Total VOCs
SWPC	-	NE	96	NE	88	62,000	2,340	NE
Vol-I/C	-	41,000	920	11,000	810	16,000	67	NE
MW-15M*	9/19/01	<20	20	74	<20	60	1,300	1,454
	10/17/02	<12	<12	47	<12	32	1,200	1,279
	9/11/03	<12	<12	37	<12	24	850	911
	9/15/04	<15	<10	31	<10	20	670	721
	9/28/05	<75	<50	110	<50	81	3,300	3,491
	8/2/06	18	49	160	35	110	4,600	4,972
	8/8/07	<75	<50	190	<50	97	4,800	5,087
	5/16/08	<75	52	190	<50	100	5,200	5,542
	8/13/08	<38	48	150	31	77	4,000	4,306
MW-110A	9/20/01	<2	76	12	320	220	120	748
MW-111*	9/20/01	<1,000	<1,000	<1,000	1,900 J	2,800	60,000	64,700
	10/17/02	<200	<200	<200	920	870	25,000	26,790
	9/10/03	<500	<500	<500	1,100	2,200	67,000	70,300
	9/15/04	<1,500	<1,000	<1,000	1,200	2,500	77,000	80,700
	9/28/05	<750	<500	<500	1,000	1,000	33,000	35,000
	8/2/06	<750	<500	<500	1,100	1,900	58,000	61,000
	8/8/07	<750	<500	<500	1,000	1,000	36,000	38,000
	8/13/08	<750	<750	<500	1,600	2,000	69,000	72,600

TABLE 2: SUMMARY OF VOLATILE ORGANIC COMPOUNDS DETECTED IN GROUNDWATER

September 2001 - August 2008

Hydraulic Containment Groundwater Treatment System

Risdon - Danbury, Connecticut

Monitoring Wells	Sample Date	VOCs Detected (ug/l)						
		1,1-Dichloroethane	1,1-Dichloroethene	cis-1,2-Dichloroethene	Tetrachloroethene	1,1,1-Trichloroethane	Trichloroethene	Total VOCs
SWPC	-	NE	96	NE	88	62,000	2,340	NE
Vol-I/C	-	41,000	920	11,000	810	16,000	67	NE
MW-112*	9/20/01	<500	<500	740	<500	<500	26,000	26,740
	10/17/02	<250	<250	280	<250	<250	14,000	14,280
	9/10/03	<200	<200	280	<200	550 J	23,000	23,830
	9/15/04	<300	<200	610	<200	500	20,000	21,110
	9/28/05	<3	<2	8.8	<2	3.4	130	142
	8/2/06	55 J	110 J	1,600	180 J	530	23,000	25,532
	8/8/07	<150	<100	700	<100	<100	6,100 J	6,800
	8/13/08	<380	<250	2,300	350	810	39,000	42,460
MW-113*	9/20/01	<10	<10	<10	620	<10	36	656
	8/14/08	<1.9	<1.2	4.6	160	5.5	11	181
MW-304	9/19/01	<1,000	2,400	<1,000	<1,000	56,000	<1,000	58,400
MW-501	9/21/01	<0.5	<0.5	<0.5	<0.5	<0.5	3.5	3.5
MW-503A ¹	9/20/01	<5	23	10	140	140	190	503
	8/6/07	<3	14	10	650	26	240	958
	8/14/08	<19	19	15	730	43	300	1,107
MW-504	8/1/06	<300	<200	2,800	<200	<200	13,000	15,800
MW-505	9/21/01	8	72	16	<5	250	390	736
MW-506	9/20/01	<10	120	<10	<10	230	790	1,140
MW-507	9/21/01	1.6	<0.5	<0.5	<0.5	4.8	0.91	7.31
	8/14/08	<0.75	<0.5	<0.5	<0.5	<0.5	<0.5	ND

TABLE 2: SUMMARY OF VOLATILE ORGANIC COMPOUNDS DETECTED IN GROUNDWATER

September 2001 - August 2008

Hydraulic Containment Groundwater Treatment System

Risdon - Danbury, Connecticut

Monitoring Wells	Sample Date	VOCs Detected (ug/l)						
		1,1-Dichloroethane	1,1-Dichloroethene	cis-1,2-Dichloroethene	Tetrachloroethene	1,1,1-Trichloroethane	Trichloroethene	Total VOCs
SWPC	-	NE	96	NE	88	62,000	2,340	NE
Vol-I/C	-	41,000	920	11,000	810	16,000	67	NE
MW-508*	9/20/01	<50	<50	52	<50	<50	2,000	2,052
	10/17/02	<10	<10	21	<10	19	970	1,010
	9/10/03	<100	<100	480	<100	170	8,800	9,450
	9/15/04	<150	<100	210	<100	300	10,000	10,510
	8/2/06	<15	<10	44	11	21	960	1,036
	8/8/07	<3.8	<2.5	21	4.3	11	280	316
	8/13/08	5.2	<2	26	2.6	5.5	160	199
MW-508C*	9/20/01	<500	820	620	<500	660	23,000	25,100
	10/17/02	<1,000	<1,000	<1,000	<1,000	<1,000	34,000	34,000
	9/10/03	<500	890	540	510	590	37,000	39,530
	9/15/04	<750	580	560	<500	700	32,000	33,840
	9/28/05	<750	600	<500	<500	520	26,000	27,120
	8/2/06	<380	480	420	440	<250	18,000	19,340
	8/8/07	<380	350	430	470	<250	17,000	18,250
	8/13/08	<300	630	980	910	450	36,000	38,970
MW-601B*	9/20/01	<25	380	60	1,000	1,100	3,100	5,640
	10/17/02	<50	330	<50	850	1,200	3,000	5,380
	9/10/03	<50	410	<50	780	1,100	2,800	5,090
	9/15/04	<38	540	39	890	1,600	2,300	5,369
	9/28/05	<38	920	29	1,600	4,600	3,400	10,549
	8/2/06	<38	680	42	860	2,800	2,600	6,982
	8/8/07	<38	280	43	1,100	850	1,100	3,373
	8/13/08	<38	480	64	1,200	1,400	2,200	5,344

TABLE 2: SUMMARY OF VOLATILE ORGANIC COMPOUNDS DETECTED IN GROUNDWATER

September 2001 - August 2008

Hydraulic Containment Groundwater Treatment System

Risdon - Danbury, Connecticut

Monitoring Wells	Sample Date	VOCs Detected (ug/l)						
		1,1-Dichloroethane	1,1-Dichloroethene	cis-1,2-Dichloroethene	Tetrachloroethene	1,1,1-Trichloroethane	Trichloroethene	Total VOCs
SWPC	-	NE	96	NE	88	62,000	2,340	NE
Vol-I/C	-	41,000	920	11,000	810	16,000	67	NE
RVW-104 ¹	1/3/02	<500	<500	<500	27,000	1,800	8,500	37,300
	8/1/06	<380	<250	<250	34,000	<250	7,300	41,300
	8/6/07	<750	<500	<500	45,000	<500	6,800	51,800
	8/14/08	<150	590	840	45,000	340	10,000 J	57,290
RW-108A	1/3/02	<1,000	8,600	<1,000	8,100	61,000	46,000	123,700
	8/1/06	<750	3,700	<500	850	33,000	21,000	58,550
	8/6/07	<750	8,300	<500	2,500	42,000	33,000	85,800
	8/14/08	<750	8,700	<500	6,400	30,000	26,000	71,100
20NR-MW1A*	2/10/06	<0.75	<0.5	<0.5	<0.5	<0.5	<0.5	ND
	8/8/07	<0.75	<0.5	<0.5	<0.5	<0.5	<0.5	ND
	8/13/08	<0.75	<0.5	0.55	<0.5	<0.5	1.8	2.4

Notes/Abbreviations:

* indicates well is located along downgradient property boundary or off-property

¹ 1,1,2-Trichloro, 1,2,2-Trifluoroethane was detected on two occasions, in August 2008 at MW-503A at 18 ug/l and at RVW-104 at 520 ug/l

Acetone was detected in MW-10 at a concentration of 7.5 ug/l in August 2008.

ug/l = micrograms per liter (parts per billion)

J = estimated

SWPC = CTDEP Remediation Standard Regulations (RSRs) Surface Water Protection Criteria

Vol-I/C = CTDEP Remediation Standard Regulations (RSRs) Volatilization Criteria Industrial/Commercial (I/C) - Proposed Revisions March 2003

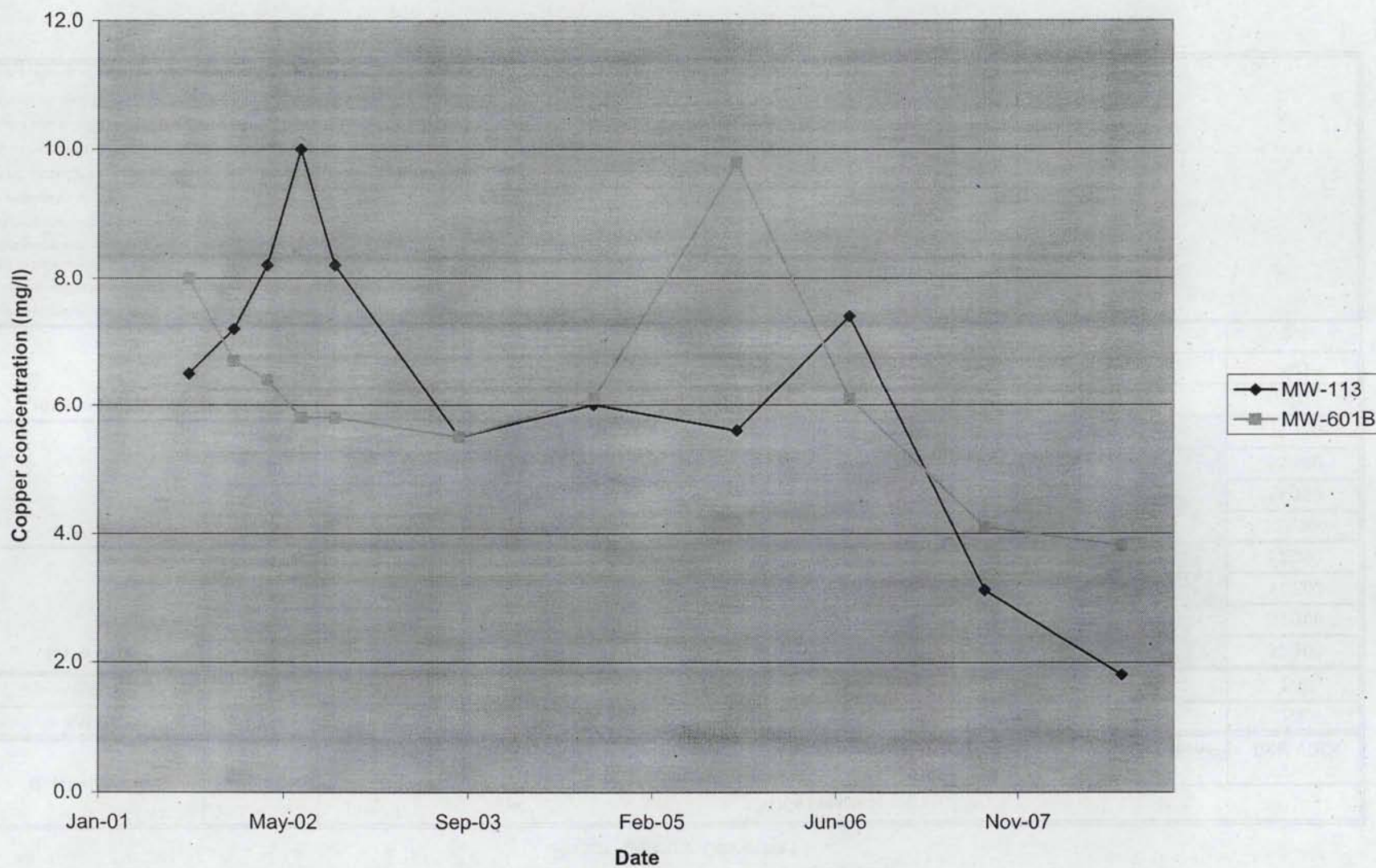
Shaded cells indicate reported concentrations area greater than an RSR criteria (SWPC for downgradient property boundary wells and off-property wells only).

NE = No standard has been established for this particular compound in the CTDEP RSRs

NS = Not sampled; MW-9 was inaccessible during the October 2002 monitoring period.

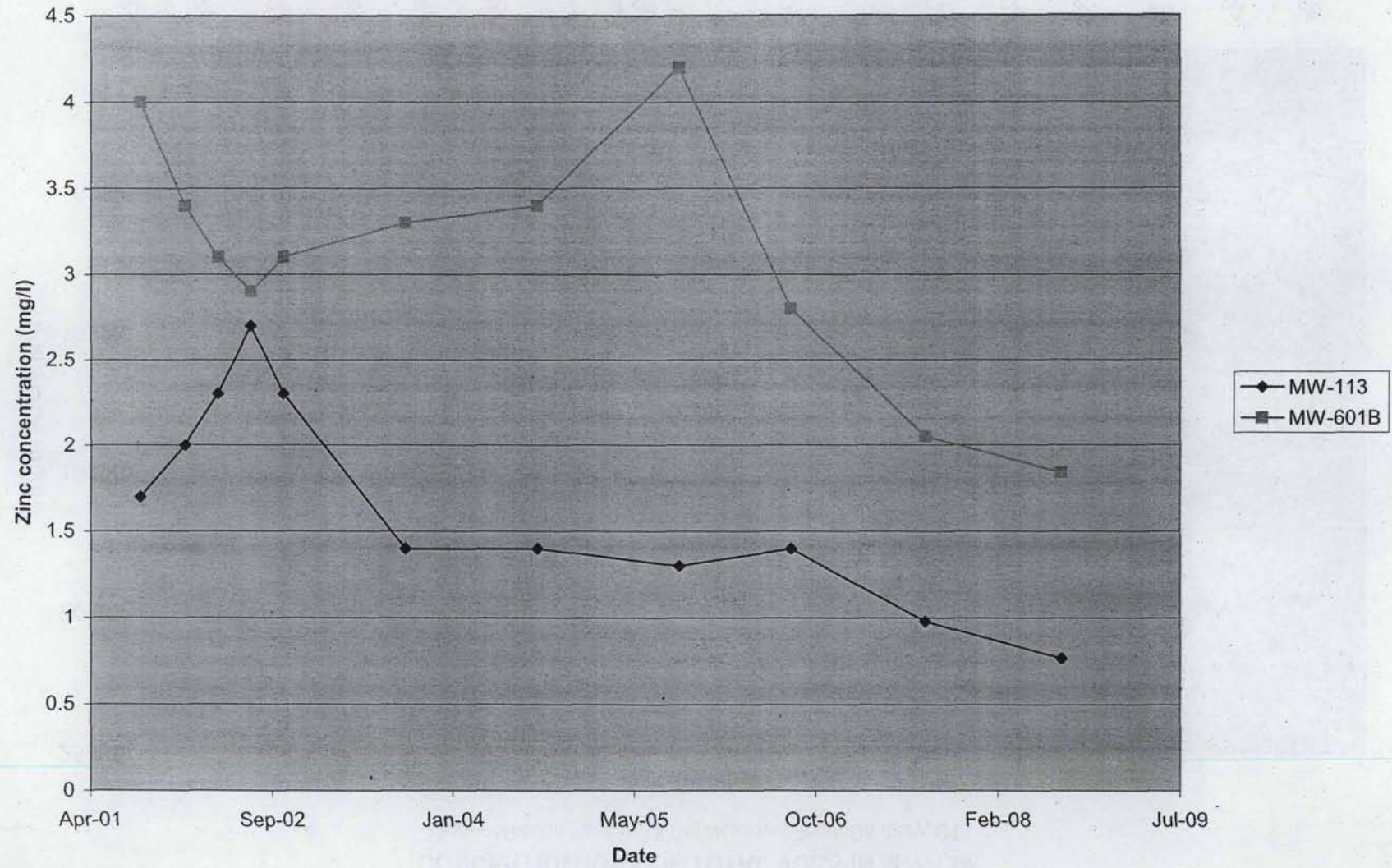
CONCENTRATIONS OF COPPER IN GROUNDWATER

Former Risdon Facility, 15 Old Newtown Road, Danbury, CT



CONCENTRATION OF ZINC IN GROUNDWATER

Former Risdon Facility, 15 Old Newtown Road, Danbury, CT



CONCENTRATIONS OF TOTAL VOCs IN MW-15M

Former Risdon Facility, 15 Old Newtown Road, Danbury, CT

